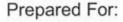
US ERA ARCHIVE DOCUMENT

Report of Dam Safety Assessment of Coal Combustion Surface Impoundments Interstate Power and Light Company Sutherland Generating Station Marshalltown, IA

AMEC Project No. 3-2106-0191

Prepared By:

AMEC Earth & Environmental, Inc. 690 Commonwealth Center 11003 Bluegrass Parkway Louisville, KY 40299



U.S. Environmental Protection
Agency
Office of Solid Waste and
Emergency Response
Office of Resource
Conservation and Recovery
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October 2012



I certify that the management units referenced herein:

Interstate Power and Light Company's Sutherland Power Station North and South Primary Settling Ponds (Primaries) and Main (Secondary and Polishing) Ash Settling Ponds were assessed on June 14, 2011. I further certify that this report was prepared under my direct personal supervision.

Signature

Don W. Dotson, PE

Senior Geotechnical Engineer

List of AMEC Participants who have participated in the assessment of the management units and in preparation of the report:

- Chris Eger
 CADD Technician
- Daniel Conn GIS Specialist
- Mary Sawitzki, PE Civil/Environmental Engineer
- James Black, PE Civil Engineer

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1.0 INTRODUCTION AND PROJECT DESCRIPTION

1.1 Introduction

AMEC was contracted by the United States Environmental Protection Agency (EPA) contract BPA EP09W001702, to perform assessments of selected coal combustion byproducts surface impoundments. AMEC was directed by EPA, through the provided scope of work and verbal communications, to utilize the following resources and guidelines to conduct a site assessment and produce a written assessment report for the coal combustion waste facilities and impoundments.

- Coal Combustion Waste (CCW) Impoundment Inspection forms (hazard rating, found in Report Appendix A)
- Coal Combustion Dam Inspection Checklist (found in Report Appendix A)
- Impoundment Design Guidelines of the Mining Safety and Health Administration (MSHA) Coal Mine Impoundment Inspection and Plan Review Handbook (hydrologic, hydraulic, and stability conditions)
- National Dam Safety Review Board Condition Assessment Definitions (condition rating)

As part of this contract with EPA, AMEC was assigned to perform an assessment of Interstate Power and Light Company's (IPL) Sutherland Generating Station (Sutherland), which is located in Marshalltown, Iowa as shown on Figure 1, the Site Location and Vicinity Map. (This figure is presented on the next page and in the figures section of this report.)

A site visit to Sutherland was made by AMEC on June 14, 2011. The purpose of the visit was to perform visual observations, to inventory coal combustion waste (CCW) surface impoundments, assess the containment dikes, and to collect relevant historical impoundment documentation.

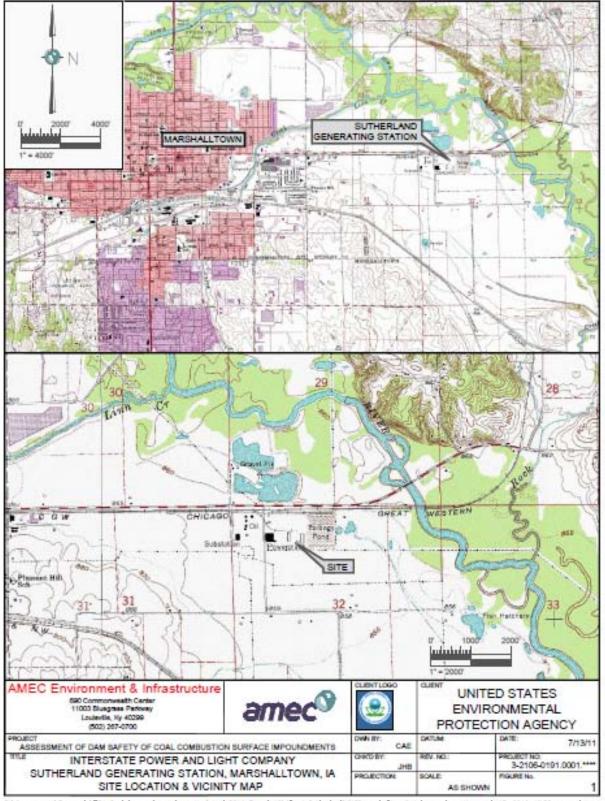
AMEC engineers, Don Dotson, PE and James Black, PE, were accompanied during the site visit by the individuals listed on Table 1.

Company or Organization	Name and Title
Interstate Power and Light Company	Nichol Toomire, Plant Manager
Interstate Power and Light Company	George Kueny, Environmental and Safety Specialist
Alliant Energy Corporate Services, Inc.	Tony Morse, Environmental Specialist II
Alliant Energy Corporate Services, Inc.	William Skalitzky, Senior Environmental Specialist

Table 1. Site Visit Attendees

AMEC submitted a draft of this report in July 2011. AMEC received comments from EPA and Alliant Energy in September 2012 Alliant Energy comments included a response to the draft report by Aether, dbs dated July 2012 (see Appendix E). Minor corrections and descriptive edits have been made within this report. Technical comments are addressed in Section 4, Comments and Recommendations section of this report. Between July 2011 and September 2012 (after AMEC's site visit), the units at the Sutherland Plant were switched from coal fired to natural gas (but still capable of burning coal). Coal combustion waste is not presently being discharged to the ponds and the water levels have dropped significantly. As a result, the descriptions of water levels within this report may not represent current conditions.

Environmental Protection Agency Ash Pond Assessment - Sutherland Generating Station AMEC Project No. 3-2106-0191 July 2011



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1.2 Project Background

Coal fired power plants, like IPL's Sutherland Generating Station, produce CCW as a result of the power production process. At Sutherland, impoundments (dams) were designed and constructed to provide storage and disposal for the CCW that is produced. CCW impoundment areas at the Sutherland facility are referred to as the North Primary Settling Pond (Unit 1 & 2 Initial Settling Pond), South Primary Settling Pond (Unit 3 Initial Settling Pond) and Main Ash Pond (Main Pond). Based on historic drawings, these ponds are located within the footprint of the original "ash pond" for the facility. At some time, the original ash pond was modified to include the primary ponds (North and South Primary Settling Ponds) to aid in the separation and removal of ash. This and other improvements, including the latest in 2006, have transformed the original "ash pond" to the current configuration to improve the detention time in the Main Pond by construction of fingers to increase the flow length and creating divisions within the basin, Polishing and Discharge (Bubbler) Ponds, to provide secondary and tertiary settlement areas. The original ash pond, current North Primary Settling Pond and Main Pond, was commissioned with Generating Units 1 and 2 at the plant in 1955. The current South Primary Settling Pond was commissioned with Generating Unit 3 in 1961.

The National Inventory of Dams (NID), administered by the U.S. Army Corps of Engineers (USACE), provides a hazard rating for many dams within the United States. The Ash Settling Ponds at Sutherland are not included in the NID.

1.2.1 Coal Combustion Dam Inspection and Checklist Forms

As part of the observations and evaluations performed at Sutherland, AMEC completed EPA's Coal Combustion Dam Inspection Checklists and CCW Impoundment Inspection Forms. Inspection forms for each pond are presented in Appendix A. The Impoundment Inspection Forms include a section that assigns a "Hazard Potential" that is used to indicate what would occur following failure of an impoundment. "Hazard Potential" choices include "Less than Low," "Low," "Significant," and "High." As defined on the Inspection Form, dams assigned a "Significant Hazard Potential" are those dams where failure or misoperation results in no probable loss of human life but can cause economic loss, environmental damage, disruption of lifeline facilities, or can impact other concerns. "Significant Hazard Potential" classification dams are often located in predominantly rural or agricultural areas but could be located in areas with population and significant infrastructure." "Low Hazard Potential" classification definition is reserved for dams where "failure or misoperation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the owner's property." "Less than Low Hazard Potential" classification is reserved for dams where "failure or misoperation results in no probable loss of human life and no economic or environmental losses."

Based on the site visit evaluation of the impoundments, AMEC engineers assigned a "Low Hazard" potential to the Main Pond. A breach of the Main Pond would be confined to the owner's property. Based on the site visit and subsequent evaluation, the North and South Ponds are considered incised within the ash management area. Incised ponds are not given hazard or condition ratings. IPL provided information on these ponds and AMEC included them in the site visit. Information within this report for the North and South Ponds are provided for reference only.

1.2.2 State Issued Permits

The Iowa Department of Natural Resources (IDNR) issued an Iowa National Pollution Discharge Elimination System (NPDES) Permit to IPL. The current permit identification number is Iowa 6469103. This NPDES Permit authorizes IPL to discharge decant from the Main Ash Pond through Outfall 001 to an unnamed tributary to the Iowa River. The effective date of the permit is November 13, 2006. The permit date of expiration is November 12, 2011. The required date to file for renewal of the permit was May 16, 2011. IPL reports they submitted the renewal application through IDNR's WWPIE web-based system on May 15, 2011. Based on this information, the renewal application is still under review.

1.3 Site Description and Location

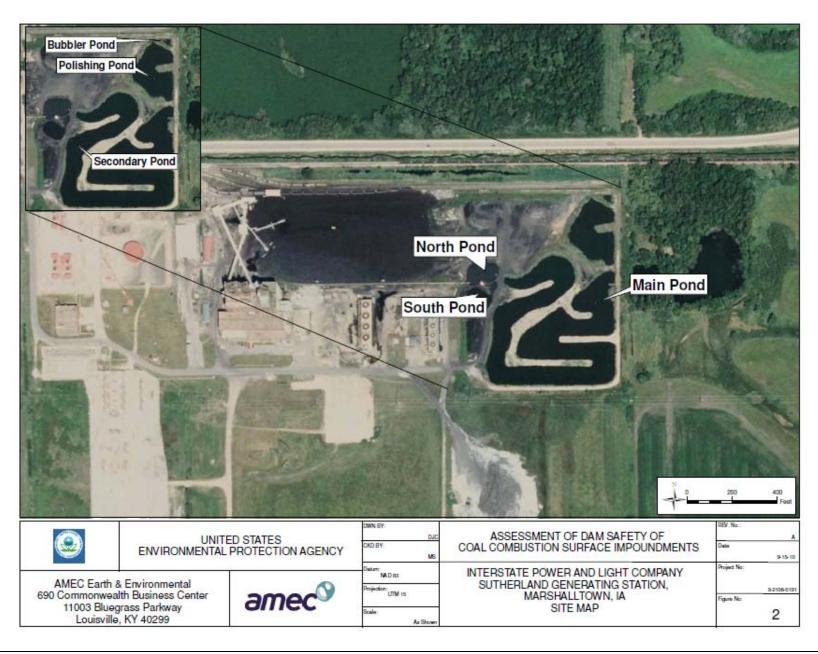
The Sutherland Generating Station is located in the city of Marshalltown, Marshall County, Iowa. The station is located on the east side of the city, adjacent and south of Main Street Road (County Highway E35) in a rural setting. Sutherland is atypical from other plants as water to cool the boilers is not obtained from an adjacent river, but from on-site wells. The ash pond area is located at the east end of the station. The Iowa River is located approximately one-half mile to the east of the site.

Figure 3, the Critical Infrastructure Map, provides an aerial view of the region and indicates the location of the Sutherland ash ponds in relation to schools, hospitals, and other critical infrastructure that is located within approximately 5 miles down gradient of the impoundments. A table that provides names and coordinate data for the infrastructure is included on the map. A Topographic Site Map is included in Figure 1. The Aerial Site Plan, shown on the next page and included in the figures section as Figure 2, provides a view of the pond areas.

1.4 Ash Ponds

The Sutherland Station originally consisted of three coal-fired steam generating units rated at 170 MW. Units 1 &2 were started in 1955 and Unit 3 started in 1962. With the retirement of Unit 2 in 2010 and the conversion of the remaining units to natural gas (but still capable of burning coal), the rated capacity for Units 1 and 3 is approximately 133 MWs.

The ash pond discharge has an NPDES permit for ash sluice water, cooling tower blowdown, boiler blowdown, low volume source leachate from a closed ash landfill, metal cleaning waste, coal pile runoff, and storm water associated with industrial activity. Bottom ash from the steam units is sluiced to the ash pond. Fly ash captured in the electrostatic precipitators is conveyed dry and stored in the fly ash silos. When the fly ash cannot be trucked offsite for beneficial uses, it is trucked to an on-site storage area where it is hydrated to form a beneficially reusable product called C-Stone. If the dry conveying system malfunctions, there is an emergency bypass system that uses water to convey fly ash to the ash pond. Cooling water for the generating units is provided by several water wells on the site, and two cooling towers provide cooling for the circulating water system. A blowdown waste stream for the towers is used in the ash handling system and eventually ends up in the ash pond. Storm water in the coal handling and storage area drains through and underground tiling system, and is pumped to the ash pond. Other low-volume waste water streams in the plant are directed to the ash pond through a ground-floor sump pump.



All of the waste water, except for sluicing of Slag from Unit 3, enters the North Primary Settling Pond at the same location. Unit 3 is a cyclone boiler and its bottom ash produces a hard glasslike material called slag. The slag from Unit 3 is sluiced to the South Primary Settling Pond where the slag can be recovered and beneficially reused. The primary ponds are dredged out two to three times a week with a long-reach back hoe. The material is scooped out of the dipping ponds, allowed to dewater, and then moved with an end-loader to a temporary storage pile. During dredging operations of the North and South Primary Ponds, valves can be turned to direct the waste water to the pond that is not currently being dredged. The small dipping ponds remove the majority of the ash material and decant water from these ponds flow through a pipe to the Main Ash Pond. In this way, the larger Main Ash Pond is reserved for settling out the finegrained suspended solids in the water streams. The Main Ash Pond consists of a Secondary Pond, Polishing Pond and small Discharge (Bubbler) Pond with decant water conveyed through the system by gravity. The outlet of the main ash pond is monitored with a parshall flume for flow quantity and other NPDES permit parameters. From this outlet, the water flows westward for several hundred yards through an open grassy ditch between the rail-road tracks. At the end of the ditch, an underground culvert directs the stream under the rail-road tracks towards the north and into the un-named drainage ditch, NPDES outfall 001, parallel to Main Street Road (County Highway E35), eventually emptying towards the east at the lowa River. The ash handling summary detailed above was based on review of provided documentation as well as communication with Alliant Energy personnel who are knowledgeable concerning the facility's operational processes.

A May 18, 2009 document, written by Alliant Energy in response to EPA's Request for Information under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C 9604(e), provided the following general background for the ash ponds.

- Both Primary and Main Ash Settling Ponds temporarily or permanently contain fly ash, bottom ash, slag, and other materials including slag and/or ash transport water, boiler water wash, air heater wash (fly ash), steam grade water water production wastewaters, cooling tower blowdown, boiler blowdown, coal pile runoff, plant floor drains, and site storm water runoff.
- Based on its review of readily available records, IPL was unable to determine
 whether the Primary Ash Ponds were initially designed by and constructed under the
 supervision of a professional Engineer. The Main Ash Ponds was designed by and
 constructed under the supervision of a professional engineer. Modifications made in
 2006 were designed by and constructed under the supervision of a professional
 engineer.
- The Primary and Main Ash Ponds are not presently inspected or monitored by a professional engineer.

IPL's March 18, 2009 response to EPA's Request for Information and other provided documentation, as well as recent communications with Alliant Energy personnel, provided the following additional information that is specific to each ash pond. Current descriptive information resulting from the site visit, as well as photographic references, are provided in Section 2 of this Assessment Report.

As previously stated, the CCW impoundment areas at the Sutherland facility are referred to as the North Primary Settling Pond, South Primary Settling Pond and Main Ash Pond. Based on historic drawings (1959 and 1961), these ponds are located within the footprint of the original "ash pond" for the facility. The provided drawings only show the location of the "ash pond" and

no other original details are known. It is presumed the original was one large ash pond. At some time, the original ash pond was modified to include the primary ponds (North and South Primary Settling Ponds). This and other improvements, including the latest in 2006, have transformed the original "ash pond" to the current configuration and include improvements to the Main Pond by construction of fingers to increase the flow length and creating divisions within the basin to provide secondary and tertiary settlement areas. The North Primary Settling Pond and Main Pond are presumed to be commissioned with generating Units 1 and 2 at the plant in 1955. The South Primary Settling Pond is presumed as commissioned with generating Unit 3 in 1961.

1.4.1 North Primary Settling Pond

The North Primary Settling Pond is located between the coal pile and Main Ash Pond. It is our understanding the actual construction date is unknown and there are no formal plans or details for the basin. The pond is presumed to be commissioned with the startup of generating Units 1 and 2 in 1955. CCW, other plant wastewaters and surface runoff water from the facility is sluiced or pumped into the North Pond. Bottom ash settles in the pond while the finer particles pass through to the Secondary Pond. The bottom ash material is regularly cleaned from the pond and stockpiled to the north to allow for dewatering and possible sale for beneficial reuse or transport to an off-site landfill. Decant from the North Pond flows by gravity through a pipe to the Main Ash Secondary Settling Pond. Table 2 provides a summary of surface area, height, storage capacity, and stored material volumes for this pond.

1.4.2 South Primary Settling Pond

The South Primary Settling Pond is located south of the North Pond and west of the Main Ash Pond. It is our understanding the actual construction date is unknown and there are no formal plans or details for the basin. The pond is presumed to be commissioned with the startup of generating Unit 3 in 1961. CCW from Unit 3 of the facility consisting of bottom ash, or "slag" can be sluiced to the South Pond by pipe. The slag is regularly cleaned from the pond and stockpiled to allow for dewatering and possible sale for beneficial reuse. Decant from the South Pond flows by gravity through a pipe to the Main Ash Secondary Settling Pond. Table 2 provides a summary of surface area, height, storage capacity, and stored material volumes for this pond.

1.4.3 Main Ash Pond

The Main Ash Settling Pond is located at the east end of the plant facilities and east of the two primary ponds. The area was commissioned in 1955 at startup of the plant (Units 1 and 2). The Main Ash Pond receives CCW decant from the North and South Primary Ponds and local surface runoff. The Main Ash Pond represents the major portion of the original ash pond for the facility. There are no original construction drawings for the main ash pond.

In 2005, the Main Ash Pond consisted of one large pond with a finger on the west side directing flow to the southwest corner then into the large Secondary Pond. The Secondary Settling Pond contained an overflow through a metering flume to the discharge structure in the Discharge Pond. In 2006, dredging, the stabilization of fingers, addition of fingers and formation of a polishing pond were constructed to allow access to the entire pond area, increase the detention path, and provide a tertiary settling area. Decant from the primary ponds to the Main Ash Pond is conveyed by gravity through pipes to the Secondary Settling Pond. Flow from the Secondary Ash Pond to the Polishing Pond is conveyed by a flume constructed with a mixing channel to

allow chemical addition to reduce algae. Flow from the Polishing Pond to the Discharge (Bubbler) Pond is conveyed by the previously mentioned metering flume. Flow is released from the Discharge Pond through a discharge manhole and 24-inch pipe. Table 2 provides a summary of surface area, height, storage capacity, and stored material volumes for these ponds.

Table 2. Ash Settling Pond Size and Storage Data

Area	Surface Area (acre)	Maximum Height of Management Unit (feet)	Storage Capacity (cubic yards)	Store Material Volume (cubic yards)
Primary Ash Settling Ponds				
North	0.30	7	2,440 ¹	490 ¹
South	0.13	7	1,050 ¹	210 ¹
Main Ash Settling Pond				
Secondary, Polishing and Discharge Settling Ponds	5.75	13 ²	83,500 ¹	4,640 ¹

Measurements, unless otherwise noted, are reported from the 2009 IPL response letter to EPA.

Measured in April 2009.

1.5 Previously Identified Safety Issues

Discussions with plant personnel and review of provided documentation indicate that there are no current or previously identified safety issues from the previous 5 years at the Sutherland Generating Station.

1.6 Site Geology

Based on research on the internet, the Sutherland Generating Station is located within the Kinderhook geologic formation. The 2011 *Ash Pond Slope Stability and Hydraulic Analysis* report by Aether, dbs reports the "surface soil in the ash management area is Zook Clay (low plasticity clay with 5-7% organic content) USCS Marshall County Soil Survey." The 2011 stability and hydraulic report also reports the depth to bedrock in the area to be over 250 feet as referenced by a provided well record for Well 6A.

1.7 Inventory of Provided Materials

IPL provided documents to AMEC that pertained to the design and operation of the Sutherland Generating Station. These documents were used in the preparation of this report and are listed in Appendix C, Inventory of Provided Materials.

² Although reported as 7 feet in response letter to EPA, the 2011 *Ash Pond Slope Stability and Hydraulic Analysis* report by Aether dbs states "the specified height of the dike for the idealized cross-section is 13 feet based on the maximum depth to native soils reported in the 2006 field investigation" (by Hard Hat Services).

2.0 FIELD ASSESSMENT

2.1 Visual Observations

AMEC performed visual assessments of Sutherland's Ash Ponds, including the North Primary Settling Pond, South Primary Settling Pond and Main Ash Pond, on June 14, 2011. Assessment of the ash ponds was completed in general accordance with FEMA's Federal Guidelines for Dam Safety, Hazard Potential Classification System for Dams, April 2004. The EPA Coal Combustion Dam Inspection Checklist and Coal Combustion Waste (CCW) Impoundment Inspection Form were completed for each ash pond during the site visit and provided to EPA via email within five business days following the site visit. Appendix A contains copies of the completed checklist forms. A Photo Location Map (B-1), as well as descriptive photos, can be found in Appendix B. Rainfall data for the Marshalltown, Iowa area was collected for thirty days prior to the site visit. Table 3, below, summarizes the rainfall data for the days and month immediately preceding AMEC's site visit.

Table 3. Sutherland Rainfall Data

Rainfall Prior to Site Visit			
Date	Rainfall (in.)		
June 5, 2011	0.01		
June 6, 2011	0.00		
June 7, 2011	0.00		
June 8, 2011	0.28		
June 9, 2011	1.54		
June 10, 2011	0.60		
June 11, 2011	0.00		
June 12, 2011	0.06		
June 13, 2011	0.05		
Total (9 days prior to visit)	2.54		
June Rainfall (13 days prior to visit)	2.55		
Total (30 days prior to visit)	5.54		

2.2 Visual Observations - North Primary Settling Pond

The North Primary Settling Pond is located within the ash management area at the east end of fenced facility building area. The North Pond is situated near the center of the west edge of the ash management area. Features surrounding the pond include the ash sediment storage area to the north, coal pile storage area to the northwest, plant cooling towers and buildings to the southwest, South Primary Settling Pond to the south and the Main Ash Pond to the east. The

slope of the adjacent area to the North Pond is either to the pond itself or to the east and southeast toward the Main Pond. CCW and other plant wastewaters enter the North Pond from pipes on its west boundary (Photo NP-1). The outlet pipe of the North Pond leaves on its east dike (Photo NP-2) and enters the Main Pond on its west dike (Photo NP-3).

2.2.1 North Primary Settling Pond - Embankments and Crest

The North Pond is separated from the South Pond by a common dike with an approximate width of 5 feet, or less. The North Pond is separated from the Main Ash Pond with a dividing dike that serves as a road with an approximate width of 25 feet. The North Pond is generally incised within ash of the ash management area (Photo NP-2). Drawings indicate the land surface elevation at the top of the north and east embankment of the North Pond is 870 feet. Drawings show the water elevation in the pond at 862.9 feet, presumed to coincide with the approximate elevation of the inlet of the outlet pipe. Settled ash is removed regularly and placed in the stockpile area to the north. Being incised within ash and regularly dredged, the upstream slopes and crest area surrounding the pond are ash and generally void of any vegetative cover (Photos NP-1 and NP-2). The lowest freeboard appears to be at the inlet of the sluice pipes. Photo NP-1 indicates a couple of feet of freeboard in this location. Any overflow back to the plant would collect to the surface water sump to be returned to the pond.

2.2.2 North Primary Settling Pond - Outlet Control Structures

The North Primary Pond discharges flow from its east dike to the Main Ash Pond (Secondary Pond) by gravity through a CMP culvert pipe located in the internal divider dike (Photos NP-2 and NP-3). The inlet and outlet elevations of the pipe are reported to be 862.6 and 861.6 feet, respectively.

2.3 Visual Observations - South Primary Settling Pond

The South Primary Settling Pond is located within the ash management area at the east end of facility building area. The South Pond is situated immediately adjacent to the North Primary Settling Pond therefore its location, surrounding features and slope of adjacent area are similar to the North Pond. CCW bottom ash or slag from generating Unit 3 enters the South Pond on its north boundary (Photo SP-1). The outlet pipe from the South Pond is located on its east dike (Photo SP-2) and the discharge enters the Main Pond on the West Dike (Photo SECP-2).

2.3.1 South Primary Settling Pond - Embankments and Crest

The South Pond is separated from the North Pond by a common dike with an approximate width of 5 feet, or less. The South Pond is separated from the Main Ash Pond with a dividing dike that serves as a road with an approximate width of 20 feet (See Figure B-1 and SECP-12). The South Pond is generally incised within ash of the ash management area. Drawings indicate the land surface elevation of the immediate area surrounding the South Pond is about 869 to 867 feet. Drawings show the water elevation in the pond at 862.6 feet, presumed to coincide with the approximate elevation of the inlet of the outlet pipe. Settled slag is removed regularly and placed in the stockpile area to the south. Being incised within ash and regularly dredged, the upstream slopes and crest area surrounding the pond are ash and void of any vegetative cover (Photos SP-1 and SP-2).

2.3.2 South Primary Settling Pond - Outlet Control Structures

The South Primary Pond discharges flow from its east dike to the Main Ash Pond (Secondary Pond) by gravity through a CMP culvert pipe located in the internal divider dike (Photos SP-2, SECP-12 and SECP-2). The inlet and outlet elevations of the pipe are 862.6 and 861.8 feet, respectively.

2.4 Visual Observations - Main Ash Pond (Secondary and Polishing Ponds and Discharge Pond)

The Main Ash Settling Pond area is located at the east end of the plant facility. The pond area includes a Secondary Pond, Polishing Pond and Discharge Pond. The Main Pond is bordered by a open grass field to the south, the North and South Primary Ponds and plant cooling towers and buildings to the west, the ash storage area to the northwest, a roadside ditch and Main Street Road to the north, and a wooded with open grass field area (south) to the east.

The existing three pond series system in the Main Ash Settling Pond area was originally constructed as a single settling pond. The original ash management area is shown on historic drawing as a rectangular area encompassing all of the ponds and the ash storage area. The exact configuration of the original pond is unknown. Prior to 2006, the Main Ash Pond area consisted of two ponds consisting of a Secondary Settling Pond and a Discharge Pond. In 2006, improvements were constructed primarily to lower solids leaving the ash pond area. The improvements included dredging of the existing pond, excavation and strengthening of existing fingers and construction of new fingers within the Secondary Pond to lengthen the flow path and allow equipment access to all areas of the pond. A Polishing Pond was constructed from the northeast end of the Secondary Pond to provide an additional settlement area. Figure 2, the Aerial Site Plan, illustrates the extent of the current three pond configuration.

The North and South Primary Ponds are used to settle and remove ash on a regular basis. The Main Ash Pond is used to settle the finer ash and finer materials in other plant wastewaters or surface runoff that flow through the primary ponds. CCW and plant overflow from the North and South Primary Ponds enter through separate pipes at the west end of the Secondary Pond. Flow is directed south to the southwest corner, then east to the southeast corner, around a half loop to the west then back to the east edge, then north to the northeast corner of the pond to the divider dike and the Polishing Pond. At the Polishing Pond, flow is directed north around a small half loop to the west then back to the east to the northeast corner to the discharge flume to the small (0.04 acre) Discharge Pond. The flow exits the Discharge Pond to a ditch. The open to piped ditch travels west along the north edge of the property approximately 1300 feet then turns north through an embankment to the Main Street Road roadside ditch. This ditch travels back to the east about 4000 feet to the lowa River.

2.4.1 Main Ash Pond (Secondary and Polishing Ponds and Discharge Pond) - Embankments and Crest

Secondary Settling Pond

It is presumed all or a good portion of the area of the ash stockpile to the northwest, the remaining west side of the Main Ash Pond and old interior fingers consist of ash from the original ash pond (Photos SECP-1 through SECP-8, NP-1 through NP-3, and SP-1 through SP-3). The interior embankments were generally in good to fair shape with steep and exposed

slopes observed at isolated locations and in reaches. Notable reaches include the following locations:

 Area beginning at the inlet from the North Pond extending northeast along the embankment below the ash stockpile area. See photo below presented as SECP-1 in Appendix B.



• Area in the vicinity of the inlet from the South Pond and to the north. See Photo SECP-2, below, and Photo SECP-3 presented in Appendix B.



 Local area located to the north of the southwest corner. See Photo below presented as Photo SECP-4 in Appendix B.



Stabilized and new fingers are primarily constructed of shot rock and/or recycled aggregate materials. Surface cover on the other areas of the interior embankments was generally good consisting of rip-rap and or grasses (Photos SECP-9 through SECP-11). Minor small woody vegetation was observed in isolated locations. Except for the areas at the North and South Primary Ponds, extensive at-grade areas exist behind the upstream embankment slopes and therefore there are no downstream slopes on the northwest and west portions of the pond (Photos SECP-1 and SECP-12). The road/crest separating the primary from the secondary pond is 20 to 25 feet wide. Any collapse of the embankments would only join the smaller primary pond to the much larger secondary pond (See Figure B-1 and SECP-12).

The south and east embankments of the Secondary Pond appear to be the original embankments. Tall grass covered the upstream slopes on these embankments which prevented observations of the surface of the slopes. Based on our observations under these restrictions, the east upstream slope appeared generally to be in fair condition (Photo SECP-13). The south upstream slope was generally in fair condition, but isolated locations of surface slough failures were observed (Photo SECP-4 and SECP-14). The number of locations seemed to increase from east to west. The downstream slopes of the east and south embankment had tall grass which prevented viewing the surface of the slopes (Photos SECP-15 through SECP-18). Based on our observations under these restrictions, the downstream slopes generally appeared to be in fair condition with one exception. The exception consisted of ponded water in an area against the downstream toe on the east embankment. See the following photo presented as Photo SECP-16 in appendix B.



Ponded water was also present to the east of this location (Photo SECP-19). The open field area to the east of the east embankment included wet area vegetation and further east a pond (Photo SECP-20).

Since the southwest and northwest embankments are situated well inside the original embankment, the crests consisted of ash. The area at the crest/entrance road near the southwest corner of the secondary pond appeared to be low and sloped to the west and away from the ash management area (Photo SECP-4). The crests of the east and south dikes were covered with gravel and appeared to be in good condition (Photos SECP-15, SECP-21, and SECP-18). Observations and survey information indicate the east and south crest heights maintain or exceed the idealized design elevation of 865 feet. The northwest and west crest generally exceeds this height and grade to the southeast toward the ponds (Photos SECP-1 and SECP-12).

Polishing Pond

The Polishing Pond was constructed in 2006 from the northeast end of the Secondary Pond. Other than the dividing structure to make a separate pond, the only change to the embankments consisted of placing fill at the northwest corner. The west slopes were observed to be the highest and appeared very steep. Isolated areas of surface sloughing on the south, west and internal finger upstream embankment slopes of the Polishing Pond exposed ash and indicate they were formed from cuts within the original ash pond (Photos PP-1 through PP-4). Tall grasses and some brushy vegetation on these slopes prevented observation of the surface of these slopes. Based on our observations under these restricted conditions and exceptions noted above, the upstream slopes generally appeared to be in fair condition. There are atgrade conditions for some distance behind these slopes and therefore no downstream slopes. More moderate upstream slopes covered with rip-rap were observed on the south half of the

east embankment. This indicates a recent repair and the slopes are in good condition (Photo PP-4). The upstream slopes on the north half of the east embankment were covered with tall grass which prevented observation of the surface of the slopes. Although restricted by these conditions, the upstream slopes viewed from across the pond appeared to be steep and in fair condition (Photo PP-5). The downstream slopes on the east embankment were covered with tall grass which prevented observations of the surface of the slopes. Although restricted by these conditions, no evidence of surface sloughing or other failures were observed on the downstream slopes (Photos SECP-15 and SECP-21).

Discharge Pond

The area at the discharge pond was covered in tall grasses which prevented viewing of the upstream and downstream slopes (Photos DP-1 and PP-4). Although restricted by these conditions, no evidence of surface sloughing or other failures were observed on the slopes.

2.4.2 Main Ash Pond (Secondary and Polishing ponds and Discharge Pond) - Outlet Control Structures

Secondary Settling Pond

Flow is discharged from the northeast corner of the Secondary Pond into the southeast corner of the Polishing Pond. The two ponds are separated by a lower elevation dike with a static mixing channel/flume. The Secondary Settling Pond overflows at elevation 862.4 feet. During an extreme hydrological event, the small dike separating the two ponds will overtop and the two ponds will work as a single pond with an approximate surface area of 6 acres (Photos SECP-13 and PP-6). At the time of our field visit, there was flow through the flume.

Polishing Pond

Flow is discharged from the northeast corner of the Polishing Pond into the southeast corner of the Small Discharge Pond through a flow monitoring flume. The flume is equipped with a solar recorder. The Polishing Pond overflows at elevation 861.6 feet. During a severe storm, the water may overtop the internal weir and flow to the Discharge Pond (Photos PP-1 and DP-1). At the time of field visit, there was flow through the flume.

Discharge Pond

Flow is discharged from the northeast corner of the Discharge Pond into a ditch at the north end of the property. Improvements were made to this outlet in 2006. The outlet consists of a inverted 24-inch diameter pipe. The pipe is "J" shaped. At the time of our field assessment, the pipe was flowing. The outlet to the ditch was submerged and could not be seen (Photos DP-1, DP-3 and DP-4). Flow travels west along the north edge of the property in an open ditch and pipe system (Photos OP-1 and OP-2) approximately 1300 feet then turns north through an embankment to the Main Street Road roadside ditch at NPDES Outfall 001 (Photo OP-3). Flow in the roadside ditch travels back to the east (Photo OP-4) about 4000 feet to discharge into the lowa River.

2.5 Monitoring Instrumentation

A partial flume at the outlet of the Polishing Pond monitors flow and other NPDES permit parameters (Photo DP-2). There is no geotechnical or groundwater monitoring instrumentation located at the Sutherland Power Station.

3.0 DATA EVALUATION

3.1 Design Assumptions

AMEC has reviewed provided documentation related to design assumptions regarding both hydraulic adequacy and dike stability.

3.2 Hydrologic and Hydraulic Design

3.2.1 Long Term Hydrologic Design Criteria

The Mine Safety and Health Administration provides minimum hydrologic criteria relevant to CCW impoundments in Impoundment Design Guidelines of the Mining Safety and Health Administration (MSHA) Coal Mine Impoundment Inspection and Plan Review Handbook (Number PH07-01) published by the U.S. Department of Labor, Mine Safety and Health Administration, Coal Mine Safety and Health, October 2007.

When detailing impoundment design storm criteria, MSHA states that dams need "to be able to safely accommodate the inflow from a storm event that is appropriate for the size of the impoundment and the hazard potential in the event of failure of the dam." Additionally, MSHA notes that sufficient freeboard, adequate factors of safety for embankment stability, and the prevention of significant erosion to discharge facilities, are all design elements that are required for dam structures under their review. Additional impoundment and design storm criteria are as shown in Table 4, MSHA Minimum Long Term Hydrologic Design Criteria.

Table 4. MSHA* Minimum Long Term Hydrologic Design Criteria

Hazard Potential	Impoundment Size	
	< 1000 acre-feet < 40 feet deep	≥ 1000 acre-feet ≥ 40 feet deep
Low - Impoundments located where failure of the dam would result in no probable loss of human life and low economic and/or environmental losses.	100 - year rainfall**	½ PMF
Significant/Moderate - Impoundments located where failure of the dam would result in no probably loss of human life but can cause economic loss, environmental damage, or disruption of lifeline facilities.	½ PMF	PMF
High - Facilities located where failure of the dam will probably cause loss of human life.	PMF	PMF

^{*}Mining Safety and Health Administration (MSHA) Coal Mine Impoundment Inspection and Plan Review Handbook (Number PH07-01) published by the U.S. Department of Labor, Mine Safety and Health Administration, Coal Mine Safety and Health, October 2007

Probable maximum flood (PMF) is, per MSHA, "the maximum runoff condition resulting from the most severe combination of hydrologic and meteorological conditions that are considered reasonably possible for the drainage area." Additionally, MSHA notes the designer should consider several components of the PMF that are site specific. These components are said to include: "antecedent storm; principal storm; subsequent storm; time and spatial distribution of the rainfall and snowmelt; and runoff conditions." Basic agreement, it was noted, exists

^{**}Per MSHA, the 24-hour duration shall be used with the 100-year frequency rainfall.

between dam safety authorities regarding "combinations of conditions and events that comprise the PMF;" however, there are "differences in the individual components that are used." MSHA provided the following as a "reasonable set of conditions for the PMF:

- Antecedent Storm: 100-year frequency, 24 hour duration, with antecedent moisture condition II (AMC II), occurring 5 days prior to the principal storm.
- Principal Storm: Probable maximum precipitation (PMP), with AMC III. The principal storm rainfall must be distributed spatially and temporally to produce the most sever conditions with respect to impoundment freeboard and spillway discharge.
- Subsequent Storm: A subsequent storm is considered to be handled by meeting the "storm inflow drawdown criteria," as described subsequently in the document.

With regard to storm influent drawdown criteria, MSHA Impoundment Design Guidelines noted that:

Impoundments must be capable of handling the design storms that occur in close succession. To accomplish this, the discharge facilities must be able to discharge, within 10 days, at least 90 percent of the volume of water stored during the design storm above the allowable normal operating water level. The 10-day drawdown criterion begins at the time the water surface reaches the maximum elevation attainable for the design storm. Alternatively, plans can provide for sufficient reservoir capacity to store the runoff from two design storms, while specifying means to evacuate the storage from both storms in a reasonable period of time - generally taken to be at a discharge rate that removes at least 90% of the second storm inflow volume within 30 days...........When storms are stored, the potential for an elevated saturation level to affect the stability of the embankment needs to be taken into account.

In, Mineral Resources, Department of Labor, Mine Safety and Health Administration, Title 30 CFR § 77.216-2 Water, sediment, or slurry impoundments and impounding structures; minimum plan requirements; changes or modifications, certification, information relevant to the duration of the probable maximum precipitation is given. Sub-section (10) of 77.216-2 states that a "statement of the runoff attributable to the probable maximum precipitation of 6-hour duration and the calculations used in determining such runoff" shall be provided at minimum in submitted plans for water, sediment or slurry impoundments and impounding structures.

The definition of design freeboard, according to the MSHA Guidelines, is "the vertical distance between the lowest point on the crest of the embankment and the maximum water surface elevation resulting from the design storm." Additionally, the Handbook states that "Sufficient documentation should be provided in impoundment plans to verify the adequacy of the freeboard." Recommended items to consider when determining freeboard include "potential wave run-up on the upstream slope, ability of the embankment to resist erosion, and potential for embankment foundation settlement." Lastly, the Handbook states, "Without documentation, and absent unusual conditions, a minimum freeboard of 3 feet is generally accepted for impoundments with a fetch of less than 1 mile."

The CCW impoundments at the Sutherland Power Station fall within the smallest storm event designation category on Table 4. Using MSHA long term hydrologic criteria, design for the 100-year, 24-hour rainfall event would be recommended.

3.2.2 Hydrologic Design Criteria - Primary Ash Settling Ponds

Hydrologic and Hydraulic information was not specifically provided for the Primary Ash Settling Ponds, however, the pond area and inflow from the plant was included in the Main pond analysis.

3.2.3 Hydrologic Design Criteria - Main Ash Settling Ponds

AMEC was provided with an Ash Pond Slope Stability and Hydraulic Analysis, completed by aether dbs and dated June 17, 2011. The Analysis stated that, with respect to stormwater runoff, the "total area contributing to the ponds is 57 acres." Areas noted as routed to the ash ponds include "the plant area, the ash management area and coal pile stormwater." These areas are shown on Figure 4. Additionally, the Analysis noted that a small dike with a static mixing channel exists between the secondary ash and polishing ponds and that "during an extreme hydrological event, the small dike......will overtop and the two ponds will work together as a single pond with an approximate surface area of 6 acres." Outer dike heights were reported as 865 feet for the Secondary Settling Pond and 864 feet for the Polishing Pond. Further, "the secondary ash settling pond overflows at elevation 862.4 feet" and "the polishing pond overflows at elevation 861.6 feet." The discharge structure for the Discharge Pond is a 24-inch diameter vertical riser pipe.

Other provided design input included:

- A current topographical map file, dated April 19, 2006, of the Primary and Main Ash Settling Pond areas, showing the Main Settling Pond reconfiguration;
- A 100-year, SCS Type 2, 24-hour storm event rainfall for Marshall County, Iowa of 6.6 inches was used in the runoff calculations. The chosen rainfall amount was based on the United States Department of Commerce, Rainfall Frequency Analysis of the United States:
- Hydraflow by Intelisolve (2002) was used to generate and route the storm hydrograph through the Main Ash Ponds (secondary settling, polishing, and small discharge ponds).
 A hydrograph report was included as part of the Analysis (Attachment B);

Design assumptions included:

- Starting pond elevation for the secondary ash pond was specified at the normal water surface elevation of 862.4 feet:
- Starting pond elevation for the polishing pond was specified at the normal water surface elevation of 861.6 feet;

The hydrograph routing output, as presented in the Analysis, indicates that the 100-year 24-hour rainfall event (6.6 inches) will result in a water surface elevation in the Secondary Settling Pond of 864.4 feet, "leaving a freeboard or slightly more than 6-inches." The Discharge Pond

was noted to reach "a storm elevation of 862.5 feet which is 1.5 feet below the outer dike height of 864 feet."

The 2011 report notes a report from plant personnel that "the site received four inches of rainfall on November 4, 2003 and the water level in the secondary ash pond rose only 6 to 7 inches above the normal operating elevation. The historical event indicates that the analysis is conservative." The 2006 improvements to the pond have changed conditions since 2003, therefore this event in effect cannot be used to prove conservatism.

3.3 Structural Adequacy & Stability

EPA policy for conventional minimum recommended factors of safety for different loading conditions are shown in Table 5 below.

Loading Condition	Minimum Factor of Safety
Rapid Drawdown	1.3
Long-Term Steady Seepage	1.5
Earthquake Loading (pseudo-static method)	1.0

Table 5. Minimum Stability Factors of Safety

To consider the structural adequacy and stability of the ash ponds at the Sutherland Generating Station, AMEC reviewed stability analysis material provided by IPL.

AMEC reviewed the June 17, 2011 report entitled Ash Pond Slope Stability and Hydraulic Analyses prepared by Aether, dbs, for the Sutherland Generating Station prepared for Interstate Power and Light (Alliant Energy). The recently completed stability analyses are summarized in Section 3.3.1. The Aether analysis included a study of a section of the south embankment of the Secondary Settling Pond dike, which is within the original ash management dike. The report presented a summary of the data that was reviewed including a previous geotechnical exploration that was performed in 2006 by Hard Hat Services entitled Field Investigation Report, Sutherland Generating Station, Bottom ash Settling Pond, as well as the results of the structural stability analyses performed for one cross-section.

Aether evaluated the overall stability of the dam by reviewing previously collected drilling data for their study. The report states:

Field characterizations of the clay unconfined compressive strength made with a pocket penetrometer are shown on the five boring logs from the outer dike of the ash pond. The cohesive strength of the clay (unconfined compressive strength divided by 2) is charted versus depth in Attachment C. All five borings produced similar strength results showing a strong crust (very stiff to hard clay above a depth of 4 feet) with stiff to firm clay underneath.

The study notes the section analyzed is a "conservative idealized section" that corresponds best with the outer dike along the south edge of the active fly ash management area". The report states the south dike is a little narrower and presumed higher because natural topography of the area slopes slightly to the south. Two to one side slopes were used for both the upstream and downstream slopes due to specifications for reconstruction of the upstream slopes and

topographic information for the downstream slopes. The embankment height of 13 feet was based on the maximum depth to native soils reported in the geotechnical investigation. With a crest elevation of 865 feet the toe of both slopes were placed at 862 feet. The study noted the bottom of pond elevations adjacent to the southernmost dike ranges between 851 to 855 feet. The top width of 13 feet was the narrowest width measured on the Settling Pond Reconfiguration Drawing for the 2006 improvements. The location of the section selected for analysis is shown on Figure 4 and a graphical representation of the section is shown on Figure 5. The analysis assumed the clay cohesion in the dike was the lowest strength measured above a depth of 14 feet, 1,250 psf, and the cohesion below the dike was the lowest measured below a depth of 13 feet, 1,000 psf. The report noted:

Fine to medium sand with silt is present below the clay in the five nearest deep borings at elevations ranging from 848 feet to 852 feet, Attachment E and F. The search for failure surfaces in the Zook Clay was limited to a depth of 9 feet below the toe of the dike to avoid the stronger sand below that depth. The sand is relatively dense and will not liquefy in a low intensity earthquake.

The report substantiated the depth to bedrock in the area was over 250 feet by providing a copy of a well record. The slope stability analyses were performed using STABL5M (1966) from Purdue University. The report states "Because the dike foundation soils are considered weaker than the dike, the most critical surface mode is a sliding block failure...."

Aether stated in their report:

Only two loading cases / failure scenarios were analyzed because in the case of a clay dike, the rapid drawdown case on the inside of the pond is essentially the same as the stability of the outside of the dike. (Clay soils cannot drain quickly; hence short term seepage forces are not a concern.)

- 1.) Ash pond water elevation at the normal elevation (862.6 feet) with a steady state seepage face emerging above the toe of the slope. Because a cohesion only strength is considered using undrained clay strength, the location of the seepage face does not influence the Factor of Safety calculation. However, water pressure on the inside of the dike can contribute to instability and it was included in the model.
- 2.) The small ponds at Sutherland Station do not pose a significant risk and contain minimum volumes of coal combustion residue. The procedures of FEMA suggest that the structures rate as low risk dams. For low risk structures, a probability of 10% in 50 years (return period of 475 years) is an acceptable standard. Consequently, a pseudostatic earthquake analysis was completed using the effective peak ground acceleration for a 475 year return period. With dense soil under the site, a Site Class "D" was selected for soil amplification giving a probable maximum horizontal earthquake acceleration of 0.019g for the ash ponds. The vertical earthquake force is specified as 2/3 of the horizontal earthquake force."

Table 6 provides a summary of the soil properties utilized in Aether's report.

Table 6. Soil Properties for Stability Analysis

Material	Unit Weight γ (lb/ft³)	Friction Angle, σ' (Degrees)	Cohesion, c' (lb/ft²)
Dike Fill (Cohesive)	130	0	1,250
Clay (Original)	126	0	1,000

3.3.1 Primary Ash Settling Ponds - Structural Adequacy & Stability

Since the North and South Primary Ponds are incised, static and seismic analyses are not required.

3.3.2 Main Ash Pond (Secondary Pond) - Structural Adequacy & Stability

Static and Seismic Analysis

A June 2011 report by Aether, dbs, titled *Ash Pond Slope Stability and Hydraulic Analysis*, for the Sutherland Generating Station presents stability analyses for Main Ash Pond. One cross section was analyzed for short term and short term seismic conditions. The location of the cross section was selected to represent the "most critical" area on the south dike. The static and seismic analyses performed by Aether contain method and procedure errors that rendered their results invalid.

In comments to the draft report Alliant Energy provided a report by Aether, dbs dated July 2012 (see Appendix E) with revised stability analyses for the Main Pond. Data used for the analyses included recent survey for four sections, and a review and adjustment to more conservative values for strength parameters for the embankment and underlying soils. The resubmission of analysis using total stress parameters are for short term conditions and are still not valid. Aether did perform a new analysis representing long term conditions using the revised data. The results of this analysis indicate a factor of safety of 1.6 for the embankment. The method of analysis appears valid and the result exceeds the required minimum factor of safety. A seismic analysis under effective stress conditions was not provided.

3.4 Foundation Conditions

Attachments to the June 17, 2011 report entitled Ash Pond Slope Stability and Hydraulic Analyses prepared by Aether, dbs, for the Sutherland Generating Station prepared for Interstate Power and Light (Alliant Energy) provides the most information concerning the foundation conditions at the site. The attachments include a geotechnical report dated March 2006 by Hard Hat Services (Attachment A) with borings performed by Cabeno, selected deep soil borings performed by Black & Veatch (Attachment E) and Team (Attachment F), and a deep well record/log for Well 6A performed in 1994 by Layne-Western.

The March 2006 geotechnical report by Hard Hat Services includes borings performed to a depth of 15 feet within the ash management area. The borings primarily characterize the embankment soils, but do penetrate the top of the foundation soils for a few feet. The borings indicate the top layer of the foundation soils consist of clay. The selected deep borings confirm a clay foundation to a depth of about 8 feet in the plant area. It appears Shelby Tubes were obtained in some of the borings, but testing results are not listed. Pocket Penetrometer tests results included two at 1500 and one at 2500 lbs per square foot. The borings show fine to coarse grained, generally loose to medium dense sands underlying the clay. The water table

was noted to be at or slightly above the start of the sand layer. Very stiff clay/glacial till was encountered at depths of about 45 to 50 feet. The deep well record for Well 6A indicates the depth to bedrock in the plant area is about 250 feet. Based on the limited provided information for the foundation soils, there is no evidence the exterior embankments of the Main Pond are built over wet ash, slag or other unsuitable materials.

3.5 Operations and Maintenance

3.5.1 Safety Assessments

IPL reported daily inspections of the plant grounds, including the ash management area, are performed daily but not documented. Documented inspections were reported to be performed bi-annually by plant environmental personnel. Based on provided documents, IPL personnel performed and recorded visual inspections of the ash ponds in November 2010 and April 2011. Each inspection report includes a title page with inspection details (site, date, weather, etc.) and a description section where a summary of recent plant operation and inspection causes/results in sentence form. Following the title page is a one page checklist to guide the site inspection to evaluate dike integrity, specifically the presence of animal activity, seepage, erosion, trees/vegetation, ponding, leakage from valving or piping, or damage due to heavy equipment use. Outfall structures are also inspected for the presence of many of the same issues. The dike walls and discharge structures are also checked for the presence of any settled ash. The final page of the report is a cumulative work items list which tracks issues; what has been, and is scheduled to be performed; and completion dates.

The visual inspection performed in November 2010 noted a tree had re-grown on the berm of the Main (Secondary) Ash Pond and fill needed on the west wall of the Unit 1 & 2 (North Primary) Pond due to recent work on the piping rack. The provided recommendations were to re-cut the tree and replace the material on the west wall. No issues were reported for the Unit 3 (South Primary) Pond.

Visual inspections performed in April 2011 noted a contractor had cut down several brush trees located outside and near the fence line of the pond (prior to the inspection). Issues observed during the inspection included animal activity on the east dike wall and the inside of the east dike wall had a small area that had sloughed off above the water level. Recommendations included setting traps for the animal problem and to repair the slough area. The attached work items page noted tree removal work completed on the outside of the east and south walls, traps set and two muskrats caught, and a due date of 6/1 for the east wall repair with no completion date listed. During AMEC's site visit, we observed a repair to the upstream slope of the east dike of the Polishing Pond.

No other plant or subcontractor inspection documentation was provided.

3.5.2 Instrumentation

There is no geotechnical or groundwater monitoring instrumentation located at the Sutherland Power Station.

3.5.3 State or Federal Inspections

No State or Federal inspections regarding the condition of the ponds have taken place at the Sutherland Power Station. A wastewater inspection was performed by Field Office #5 for the

State of Iowa Department of Natural resources in September, 2010. This inspection specifically addressed NPDES effluent/monitoring details and did not address the condition of the embankments. The report did note the solar powered 4210 Ultrasonic Flow Meter had not been calibrated in quite some time and recommended calibration at least annually if not semi-annually.

4.0 COMMENTS AND RECOMMENDATIONS

Condition assessment definitions, as accepted by the National Dam Safety Review Board, are as follows:

SATISFACTORY

No existing or potential dam safety deficiencies are recognized. Acceptable performance is expected under all loading conditions (static, hydrologic, seismic) in accordance with the applicable regulatory criteria or tolerable risk guidelines.

FAIR

No existing dam safety deficiencies are recognized for normal loading conditions. Rare or extreme hydrologic and/or seismic events may result in a dam safety deficiency. Risk may be in the range to take further action.

POOR

A dam safety deficiency is recognized for loading conditions which may realistically occur. Remedial action is necessary. POOR may also be used when uncertainties exist as to critical analysis parameters which identify a potential dam safety deficiency. Further investigations and studies are necessary.

UNSATISFACTORY

A dam safety deficiency is recognized that requires immediate or emergency remedial action for problem resolution.

NOT RATED

The dam has not been inspected, is not under state jurisdiction, or has been inspected but, for whatever reason, has not been rated.

4.1 Acknowledgement of Management Unit Conditions

I certify that the management units referenced hereinafter were personally assessed by me and was found to be in the following condition:

Main Ash Settling Pond (Secondary, Polishing and Discharge Ponds): Fair

4.2 Recommendations

(The north and south primary settling ponds are incised within the ash management area. Incised ponds are not given condition ratings.)

The Fair rating for the Main Ash Pond reflects the fact that rare or extreme hydrologic and/or seismic events may result in a dam safety deficiency. Uncertainties exist as to critical analysis parameters which identify a potential dam safety deficiency. Further investigations and studies

are necessary. In addition, vegetation on the embankments was too high to inspect the embankments closely.

4.2.1 Hydrologic and Hydraulic

Main Ash Settling Ponds

Although the small discharge pond was reported to maintain a freeboard of 1.5 feet while passing the 100-year 24-hour design storm (condition rating of Fair), the other two components of the Main Ash Settling Ponds (the Secondary Settling and Polishing Ponds) were inundated and operated as a single pond during the 100-year 24-hour storm event. Additionally, the resulting freeboard of their combined condition, indicated by the storm routing, was just over 6 inches.

In comments to the draft report Alliant Energy states that the conversion to natural gas and resulting lower water level "can clearly handle a 100 year 24 hour storm. AMEC agrees that with the lower static water level from the conversion the Main Pond would be capable of handling the storm. However, with the ability to burn coal and return the ponds to the original condition there is only 6 inches of freeboard during the design storm event. AMEC recommends an evaluation of the ponds to determine if the freeboard can be increased if the plant returns to burning coal.

4.2.2 Geotechnical and Stability Recommendations

Conventional minimum factor of safety criteria are 1.5 for static long-term stability and 1.0 for earthquake stability (by pseudo-static method). Likewise, if the dam does not meet the above seismic factor of safety, then the stability of the embankment should be analyzed and the amount of embankment deformation or settlement that may occur should be evaluated to assure that sufficient section of the crest will remain intact to prevent a release from the impoundment.

A June 2011 report by Aether, dbs, titled *Ash Pond Slope Stability and Hydraulic Analysis*, for the Sutherland Generating Station presents stability analyses for Main Ash Pond. One cross section was analyzed for short term and short term seismic conditions. The location of the cross section was selected to represent the "most critical" area on the south dike.

In comments to the draft report Alliant Energy provided a report by Aether, dbs dated July 2012 (see Appendix E) with revised stability analyses for the Main Pond. Data used for the analyses included recent survey for four sections, and a review and adjustment to more conservative values for strength parameters for the embankment and underlying soils. The resubmission of analysis using total stress parameters are for short term conditions and are still not valid. Aether did perform a new analysis representing long term conditions using the revised data. The results of this analysis indicate a factor of safety of 1.6 for the embankment. The method of analysis appears valid and the result exceeds the required minimum factor of safety. A seismic analysis under effective stress conditions was not provided. AMEC recommends a seismic analysis using effective stress parameters be performed to meet the stability analysis requirements for the Main Pond.

The vegetation on the embankment slopes of the Main Ash Pond was too tall to inspect the embankment closely. No visible signs of major slope failures were observed. AMEC recommends IPL periodically mow the area to allow inspection of the embankments. One of the

formal plant inspections could be performed in the winter/early spring months when the vegetation is low and the embankments are more visible. Mowing may be needed at the time of the other inspection and/or inspection by an engineer as recommended below, ideally preceding or following the normal season of heavier rainfall. Mowing should extend at least to the fence on the downstream embankments. Mowing beyond the fence may need to be coordinated with or approved by a regulatory agency as adjacent areas could be classified as wetlands. Maintenance issues such as steep and exposed slopes, and water against the toe of the slope as described in Section 2.4.1 and other issues discovered after mowing should be promptly addressed to maintain the structural integrity of the embankments.

4.2.3 Inspection Recommendations

Inspection procedures at the Sutherland station include daily, undocumented inspection of the grounds by plant personnel and bi-annual, documented inspections by plant environmental staff.

AMEC recommends that Alliant Energy, IPL, revise the bi-annual inspection to reflect the changes in 2006 by completing forms for each impoundment of the Main Pond. AMEC suggests a map be included to maintain a record of the approximate locations of any identified problems. A map could also be used to maintain a record of work performed cumulatively or since the last inspection. AMEC recommends annual visual inspections of each management unit should be performed by a Professional Engineer, either by a consultant or by internal, off-site personnel. Inspection reports are and should be maintained by the facility. Additionally, routine inspections (daily or weekly) performed by facility O&M personnel could be supported by an inspection checklist to serve as documentation of the inspection.

Vegetation on the impoundments should continue to be aggressively managed. We further recommend that vegetation be managed based on guidance in (a) Corps of Engineers EM 1110-2-301, Guidelines for Landscape Planting and Vegetation Management at Floodwalls, Levees, and Embankment Dams and (b) FEMA 534, Technical Manual for Dam Owners: Impacts of Plants on Earthen Dams. Additionally, animal impact should be mitigated based on guidance in FEMA 473, Technical Manual for Dam Owners: Impacts of Animals on Earthen Dams.

The paragraphs above in this section were provided in the draft report. Comments to the draft report by Alliant Energy states that subsequent to the ash pond assessments by EPA,

"Alliant Energy has prepared a "Corporate Operations and Maintenance Plan" (Corporate Plan) that outlines the proper operations and maintenance of coal combustion ash ponds based on the guidance documents readily available from the Corps of Engineers; FEMA; and OSHA. In addition to the Corporate Plan, each generating station has a "Site Specific Operations and Maintenance Plan" (Site Plan) that defines the roles; responsibilities; and actions required by the generating station to ensure our ponds are maintained and operated in a safe manner now and in the future. As part of the Site Plan, a 3rd Party PE will inspect the site on an annual basis to evaluate the current conditions; evaluate maintenance activities; and provide additional guidance to improve the overall safety of the ponds. The inspection sheet has been revised accordingly to include monthly and more detailed quarterly inspection. We anticipate having this plan, including training; operational at the Sutherland Generating Station by December 31, 2012.

AMEC commends Alliant Energy's Corporate and Site Plan initiatives. Provided the maintenance issues described herein are addressed, the proposed inspections and subsequent maintenance will provide a means to monitor and maintain the overall condition of the ponds.

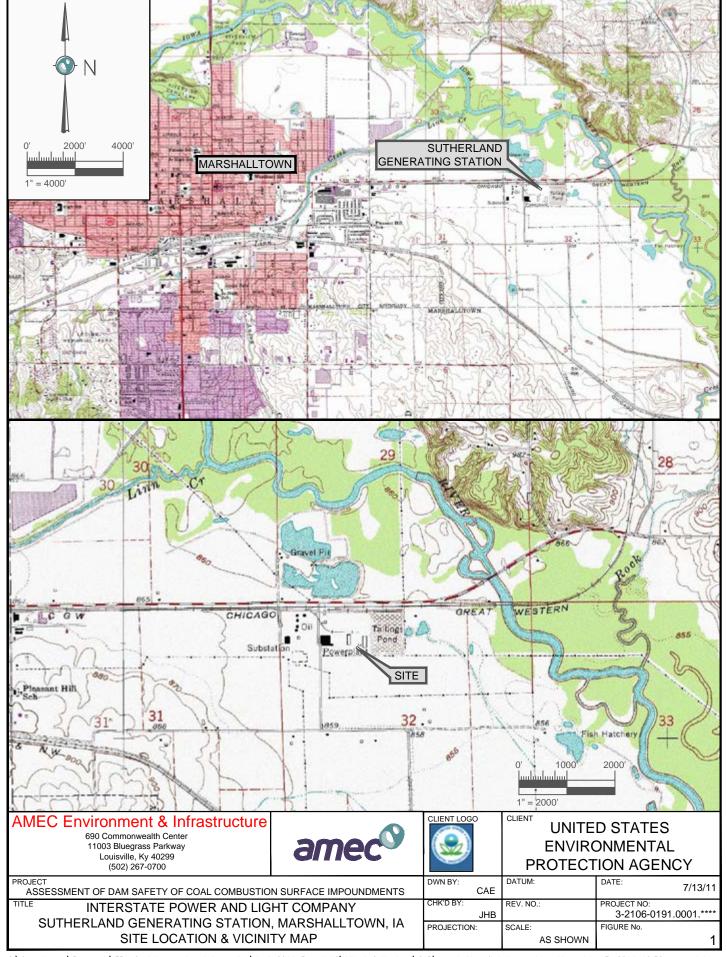
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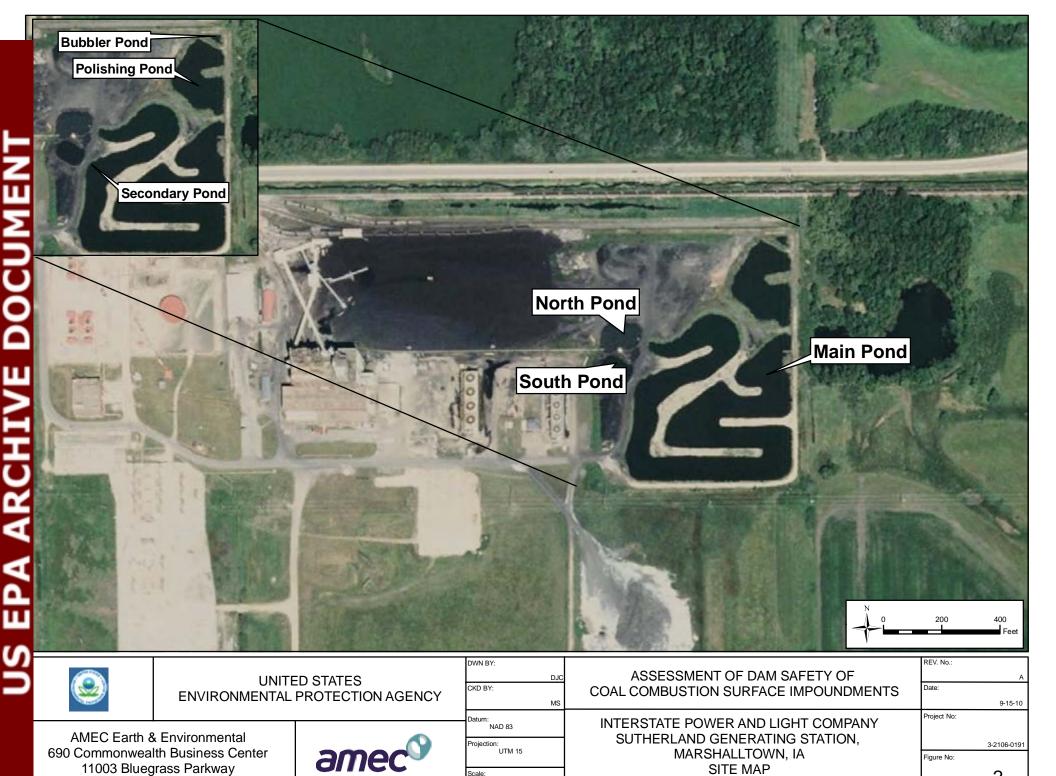
This report is prepared for the exclusive use of the Environmental Protection Agency for the site and criteria stipulated herein. This report does not address regulatory issues associated with storm water runoff, the identification and modification of regulated wetlands, or ground water recharge areas. Further, this report does not include review or analysis of environmental or regional geo-hydrologic aspects of the site, except as noted herein. Questions or interpretation regarding any portion of the report should be addressed directly by the geotechnical engineer.

Any use, reliance on, or decisions to be made based on this report by a third party are the responsibility of such third parties. AMEC accepts no responsibility for damages, if any, suffered by any third party as a result of decisions made or actions based on this report.

The conclusions and recommendations given in this report are based on visual observations, our partial knowledge of the history of Sutherland's impoundments, and information provided to us by others. This report has been prepared in accordance with normally accepted geotechnical engineering practices. No other warranty is expressed or implied.

FIGURES





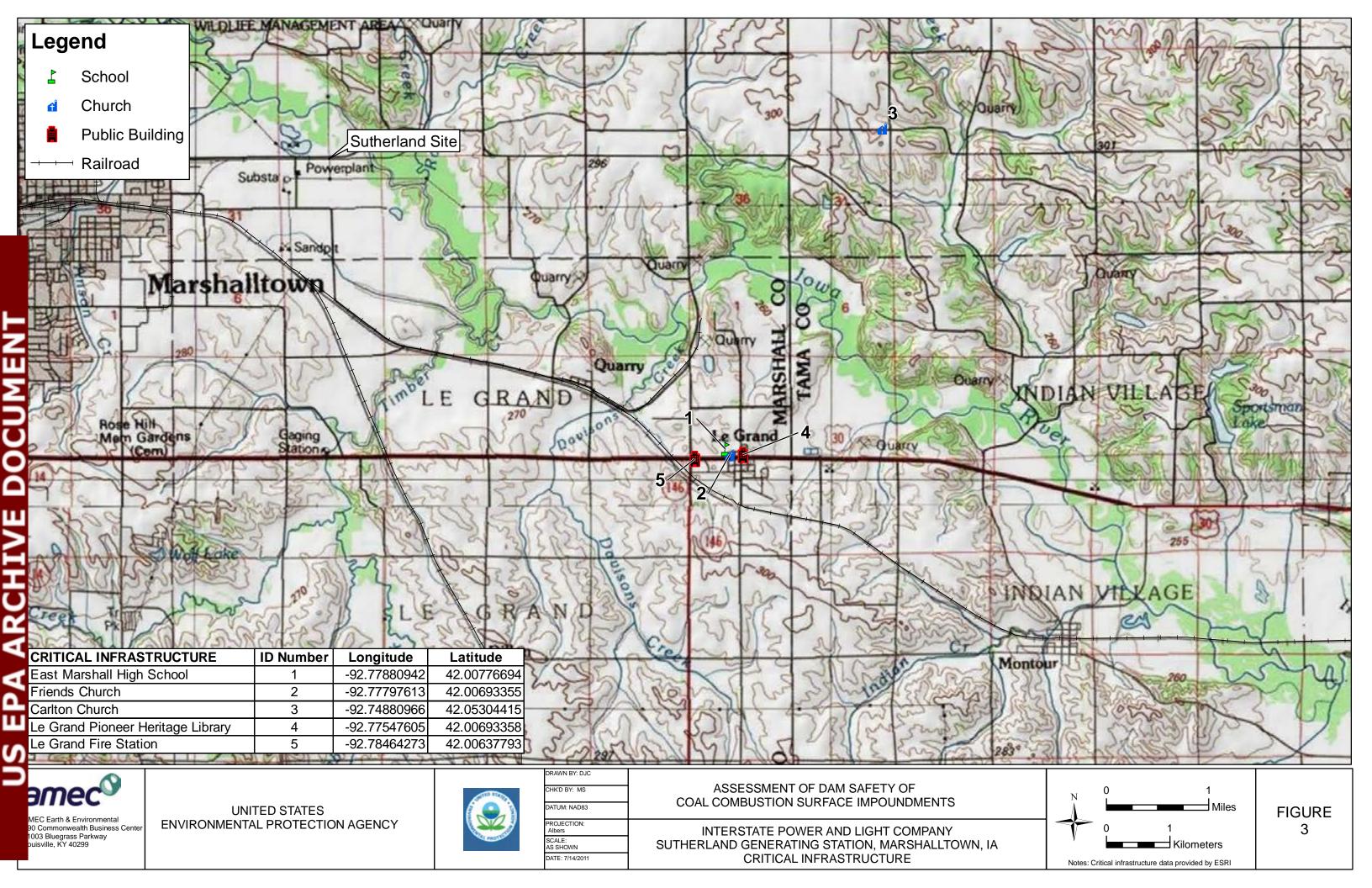
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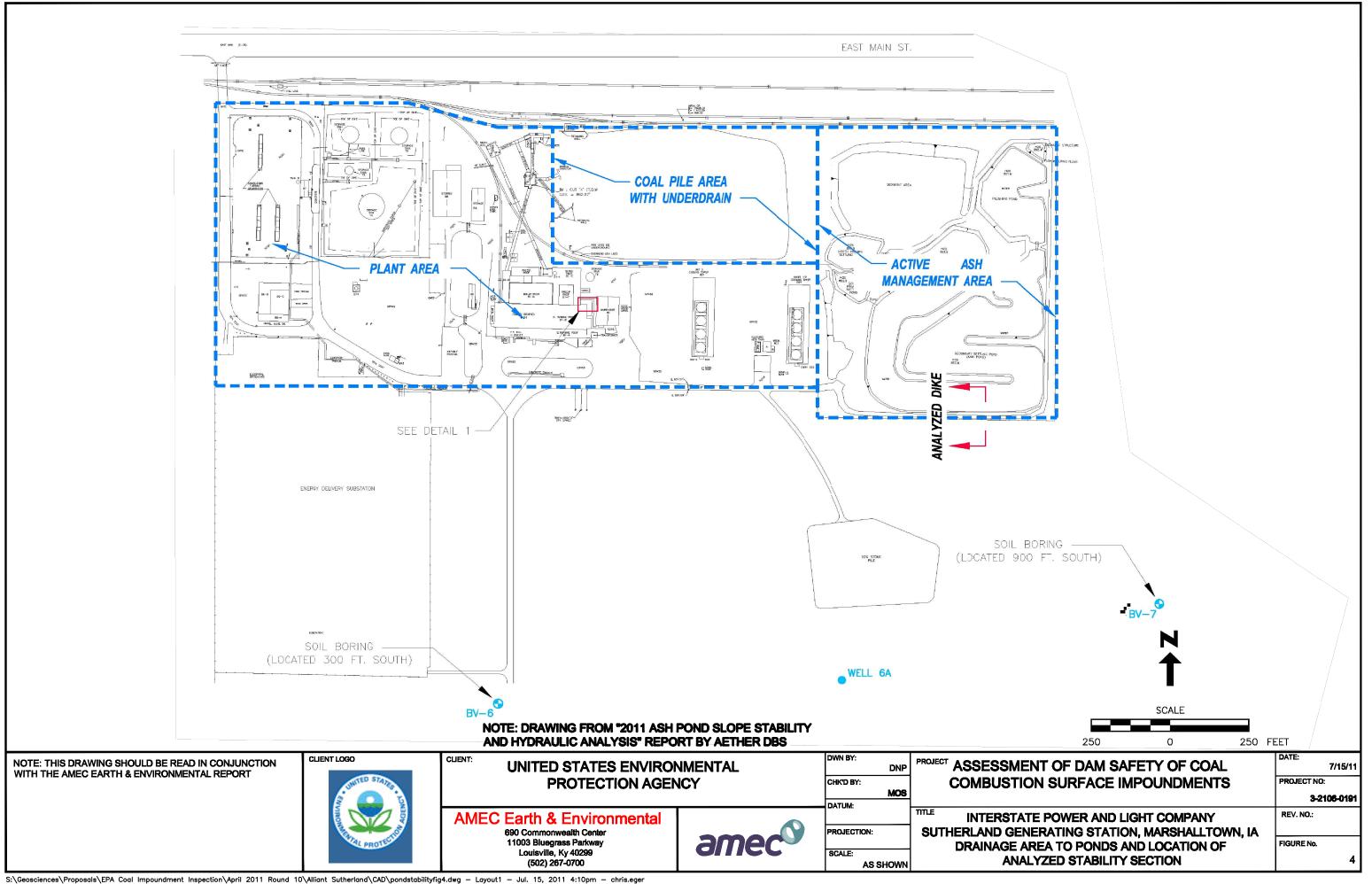
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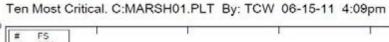
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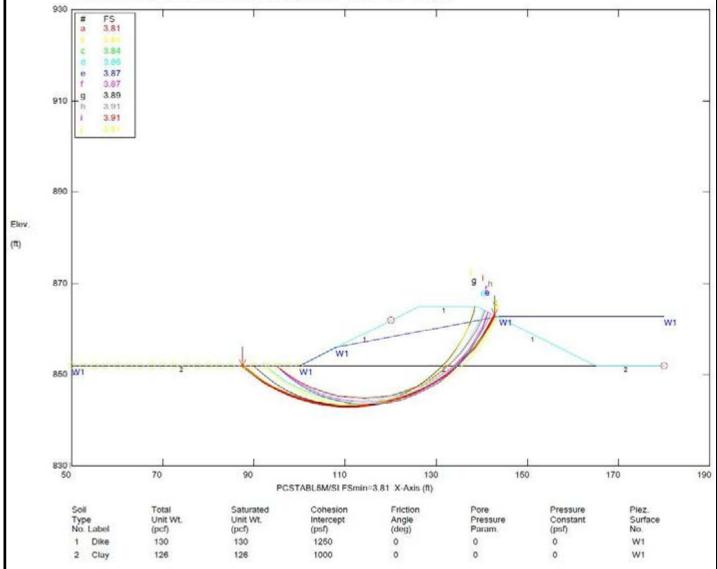




CONFIDENTIAL BUSINESS INFORMATION

Alliant Energy - Marshalltown, Iowa Static Case





AMEC Earth & Environmental

ouleville, Ky 4025 (802) 267-0700



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CLENT **UNITED STATES ENVIRONMENTAL** PROTECTION AGENCY

PROJECT
ASSESSMENT OF DAM SAFETY OF COAL COMBUSTION SURFACE IMPOUNDMENTS

INTERSTATE POWER AND LIGHT COMPANY SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA **CRITICAL CROSS-SECTION SECONDARY POND**

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APPENDIX A

EPA COAL COMBUSTION DAM INSPECTION CHECKLISTS AND COAL COMBUSTION WASTE IMPOUNDMENT INSPECTION FORMS DATA - JUNE 2010



Site Name: Sutherland Date: 6/14/2011

Unit Name: Main Ash Pond * Operator's Name: Alliant Energy (IPL)

Unit I.D.: Hazard Potential Classification: High Significant Low

Inspector's Name: Don Dotson/James Black, PE

Check the appropriate box below. Provide comments when appropriate. If not applicable or not available, record "N/A". Any unusual conditions or construction practices that should be noted in the comments section. For large diked embankments, separate checklists may be used for different embankment areas. If separate forms are used, identify approximate area that the form applies to in comments.

* Includes Secondary, Polishing and Discharge Pond.	Yes N	0	Yes	No
4. Francisco de Composido Dom Inorgantiano	See Commen	t 40 Claushian anhulainn an alamas	Can Ca	

1. Frequency of Company's Dam Inspections?	See Co	mment	18. Sloughing or bulging on slopes?	See C	Comment
2. Pool elevation (operator records)?	85	2.6	19. Major erosion or slope deterioration?	See C	Comment
3. Decant inlet elevation (operator records)?	85	9.6			
4. Open channel spillway elevation (operator records)?	N	/A	Is water entering inlet, but not exiting outlet?		X
5. Lowest dam crest elevation (operator records)?	8	65	Is water exiting outlet, but not entering inlet?		X
If instrumentation is present, are readings recorded (operator records)?	N	/A	Is water exiting outlet flowing clear?	X	
7. Is the embankment currently under construction?		X	21. Seepage (specify location, if seepage carries fines, and approximate seepage rate below):		
8. Foundation preparation (remove vegetation, stumps, topsoil in area where embankment fill will be placed)?	N	/A	From underdrain?		X
Trees growing on embankment? (If so, indicate largest diameter below)		X	At isolated points on embankment slopes?		X
10. Cracks or scarps on crest?		X	At natural hillside in the embankment area?		X
11. Is there significant settlement along the crest?		X	Over widespread areas?		X
12. Are decant trash racks clear and in place?	N	/A	From downstream foundation area?		X
13. Depressions or sinkholes in tailings surface or whirlpool in the pool area?		X	"Boils" beneath stream or ponded water?		X
14. Clogged spillways, groin or diversion ditches?		X	Around the outside of the decant pipe?		X
15. Are spillway or ditch linings deteriorated?		X	22. Surface movements in valley bottom or on hillside?		X
16. Are outlets of decant or underdrains blocked?	See Co	mment	23. Water against downstream toe?	X	X
17. Cracks or scarps on slopes?	see Co	mment	24. Were Photos taken during the dam inspection?	X	

Major adverse changes in these items could cause instability and should be reported for further evaluation. Adverse conditions noted in these items should normally be described (extent, location, volume, etc.) in the space below and on the back of this sheet.

Inspection Issue #	Comments

1. Bi-annual documented inspection of pond system by on-site Environmental and Safety Specialist;

plant personnel perform daily inspection - not documented.

- 2. Secondary pond pool elevation (highest) listed.
- 3. Pipe in discharge pond listed.
- 9, 17 & 18. Vegetation too tall to inspect embankment closely.
- 23. Locations on East Dike of Secondary Pond.

U. S. Environmental Protection Agency

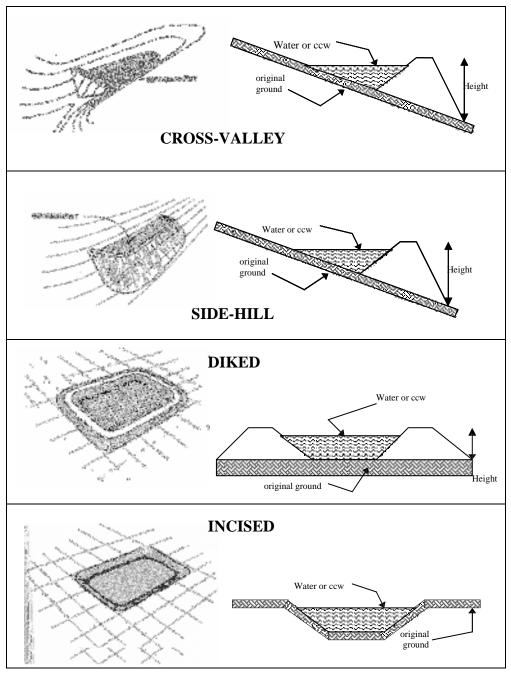


Coal Combustion Waste (CCW) Impoundment Inspection

Impoundment NPDES Permit # 64-69-1-03	INSPECTOR Dotson/Black
Date <u>06/14/2011</u>	
Impoundment Name <u>Main ash pond (Secondary, Poundment Company Interstate Power & Light - Secondary Company Inte</u>	Sutherland Generating Station
Date <u>06/14/2011</u> Impoundment Name <u>Main ash pond (Secondary, Polishing & Discharge Ponds)</u> Impoundment Company <u>Interstate Power & Light - Sutherland Generating Station</u>	
(Report each impoundment on a separate form unde	r the same Impoundment NPDES Permit
New X Update	
Is water or ccw currently being pumped into	X
IMPOUNDMENT FUNCTION: Secondary & Ten	rtiary Settling of CCW, surface runoff
and other plant waste streams.	
Distance from the impoundment 5 miles	
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Does a state agency regulate this impoundment? YH	

HAZARD POTENTIAL (In the event the impoundment should fail, the following would occur):
LESS THAN LOW HAZARD POTENTIAL: Failure or misoperation of the dam results in no probable loss of human life or economic or environmental losses.
X LOW HAZARD POTENTIAL: Dams assigned the low hazard potential classification are those where failure or misoperation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the owner's property.
SIGNIFICANT HAZARD POTENTIAL: Dams assigned the significant hazard potential classification are those dams where failure or misoperation results in no probable loss of human life but can cause economic loss, environmental damage, disruption of lifeline facilities, or can impact other concerns. Significant hazard potential classification dams are often located in predominantly rural or agricultural areas but could be located in areas with population and significant infrastructure.
HIGH HAZARD POTENTIAL: Dams assigned the high hazard potential classification are those where failure or misoperation will probably cause loss of human life.
DESCRIBE REASONING FOR HAZARD RATING CHOSEN: Release would stay within plant (IPL) property. (No adjacent major river or stream, operation water obtained from wells.)

CONFIGURATION:



Cross-Valley

Side-Hill

X Diked (Construction within former ash management area)

Incised (form completion optional)

Combination Incised/Diked

Embankment Height 7 feet Embankment Material Clay
Pool Area 6.18 acres acres Liner N/A

Current Freeboard 3.4 feet Liner Permeability N/A

TYPE OF OUTLET (Mark all that apply)

Open Channel Spillway	TRAPEZOIDAL	TRIANGULAR
X Trapezoidal	Top Width	Top Width
Triangular		—
Rectangular	Depth	Depth
Irregular	Bottom	
Partial Flume from Secondary and Polishing Pond	Width	
1 onsiming 1 ond	RECTANGULAR	IRREGULAR Average Width
depth		1
bottom (or average) width		•
top width	Depth	Avg Depth
X Drop inlet pipe from	↓	Бери
Discharge pond	Write	
Discharge polici	Width	
Outlet		
Ounci		
24" inside diameter		
Material		Inside Diameter
corrugated metal)
welded steel		
X concrete* * w/metal cap		
plastic (hdpe, pvc, etc.)		•
other (specify)		
Is water flowing through the outlet?	YES X NO	0
No Outlet		
Other Type of Outlet (spec	11ty)	
The Impoundment was Designed By	Hard Hat Services, In	IC.

Has there ever been a failure at this site? YES	NOX
If So When?	
If So Please Describe:	

Has there ever been significant seepages at this site?	YES	NOX
If So When?		
IF So Please Describe:		

t this site?	YES	NO _	X			
If so, which method (e.g., piezometers, gw pumping,)?						
so Please Describe :						

APPENDIX B SITE PHOTO LOG MAP AND SITE PHOTOS



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INTERSTATE POWER AND LIGHT COMPANY SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA SITE MAP

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NP-1 LOOKING WEST AT CCW AND OTHER WASTESTREAM INLET PIPES FROM PLANT



NP-2 LOOKING NORTH AT INLET OF OUTLET PIPE

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TITLE
INTERSTATE POWER AND LIGHT COMPANY
SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA

NORTH POND SITE PHOTOS

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NP-3 LOOKING EAST AND DOWN AT OUTLET OF PIPE FROM NORTH POND TO SECONDARY POND

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SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA
NORTH POND SITE PHOTOS

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SP-1 LOOKING NORTH AT CCW INLET PIPE TO SOUTH POND. NORTH POND ABOVE AND TO THE RIGHT



SP-2 FROM SOUTH CREST LOOKING EAST AT INLET OF OUTLET PIPE FROM SOUTH POND

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INTERSTATE POWER AND LIGHT COMPANY
SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA
SOUTH POND SITE PHOTOS

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SECP-1 LOOKING WEST AT START OF SECONDARY POND. STEEP/BARE SLOPES ON NORTH INTERIOR EMBANKMENT. NOTE GRADE (TRUCK) TO NORTH



SECP-2 LOOKING SOUTHWEST AT INTERIOR OF SECONDARY POND. STEEP AND BARE SLOPE AREA AT SOUTH POND INLET IN BACKGROUND

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ASSESSMENT OF DAM SAFETY OF COAL COMBUSTION SURFACE IMPOUNDMENTS DWN INTERSTATE POWER AND LIGHT COMPANY SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA PRO **SECONDARY POND SITE PHOTOS**

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SECP-3
LOOKING NORTH AT INTERIOR AND WEST DIKE US SLOPES OF SECONDARY
POND, STEEP/BARE AREA AT INLET FROM SOUTH POND (TOP LEFT)



SECP-4
LOOKING WEST AT US SLOPES OF SOUTH DIKE OF SECONDARY POND.
TALL VEGETATION, SLOUGHS OBSERVED ON US SLOPE

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TITLE
INTERSTATE POWER AND LIGHT COMPANY
SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA
SECONDARY POND SITE PHOTOS

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SECP-5
LOOKING SOUTH AT INTERIOR AND WEST EMBANKMENT OF SECONDARY POND



SECP-6
LOOKING NORTHEAST AT WEST UPPER SECTION OF
SECONDARY POND. ROCK AT TOE OF INTERIOR SLOPES

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INTERSTATE POWER AND LIGHT COMPANY
SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA
SECONDARY POND SITE PHOTOS

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SECP-7
LOOKING NORTHEAST AT INTERIOR OF START OF SECONDARY
POND. STEEP SLOPES AND TALL GRASSES ON NORTH BANK



SECP-8
LOOKING SOUTHEAST AT INTERIOR OF SECONDARY POND

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INTERSTATE POWER AND LIGHT COMPANY
SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA
SECONDARY POND SITE PHOTOS

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SECP-9
LOOKING EAST AT SOUTH INTERIOR OF SECONDARY POND.
INTERIOR FINGERS COMPLETED IN 2006 IN BACKGROUND



SECP-10 LOOKING EAST-SOUTHEAST AT INTERIOR OF SECONDARY POND. WEST (START) IN FOREGROUND, EAST (END) IN BACKGROUND

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INTERSTATE POWER AND LIGHT COMPANY
SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA
SECONDARY POND SITE PHOTOS

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SECP-11
FROM START OF FINGER ACROSS FROM SOUTH POND
LOOKING EAST AT INTERIOR OF POND



SECP-12 LOOKING NORTH AT US SLOPES OF WEST DIKE OF SECONDARY POND, TALL VEGETATION, STEEP/BARE AREA AT INLET FROM SOUTH POND

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INTERSTATE POWER AND LIGHT COMPANY
SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA
SECONDARY POND SITE PHOTOS

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SECP-13
LOOKING SOUTH AT US SLOPES OF EAST DIKE, INTERIOR, AND OVERFLOW
DIKE BETWEEN SECONDARY AND POLISHING PONDS, TALL VEGETATION



SECP-14 LOOKING EAST AT US SLOPES OF SECONDARY POND, TALL VEGETATION AND ISOLATED ERODED AREAS

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SECP-15 LOOKING SOUTH AT EAST DIKE CREST AND **DOWNSTREAM EMBANKMENT**



SECP-16 LOOKING SOUTH AT CREST AND DS SLOPE OF EAST DIKE OF SECONDARY POND, WATER AT TOE OF DOWNSTREAM SLOPE

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PROJECT
ASSESSMENT OF DAM SAFETY OF COAL COMBUSTION SURFACE IMPOUNDMENTS

INTERSTATE POWER AND LIGHT COMPANY SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA **SECONDARY POND SITE PHOTOS**

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SECP-17 LOOKING WEST AT DS SLOPES AND CREST OF SOUTH DIKE OF SECONDARY POND, TALL VEGETATION



SECP-18 LOOKING EAST AT CREST OF SOUTH DIKE OF SECONDARY POND, TALL VEGETATION ON US AND DS SLOPES

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ASSESSMENT OF DAM SAFETY OF COAL COMBUSTION SURFACE IMPOUNDMENTS INTERSTATE POWER AND LIGHT COMPANY SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA **SECONDARY POND SITE PHOTOS**

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SECP-19 LOOKING SOUTHEAST FROM SECONDARY POND. WATER AT AND BEYOND TOE OF DS SLOPE



SECP-20 LOOKING SOUTHEAST AT POND TO EAST OF EAST DIKE

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ASSESSMENT OF DAM SAFETY OF COAL COMBUSTION SURFACE IMPOUNDMENTS

INTERSTATE POWER AND LIGHT COMPANY SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA **SECONDARY POND SITE PHOTOS**

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SECP-21 LOOKING NORTH AT CREST AND SLOPES OF SECONDARY AND POLISHING PONDS, TALL VEGETATION ON SLOPES

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ASSESSMENT OF DAM SAFETY OF COAL COMBUSTION SURFACE IMPOUNDMENTS

INTERSTATE POWER AND LIGHT COMPANY SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA **SECONDARY POND SITE PHOTOS**

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PP-1 LOOKING SOUTHWEST AT INTERIOR AND WEST DIKE OF POLISHING POND. STEEP SLOPES, SLOUGH AREAS, AND TALL VEGETATION



PP-2 LOOKING NORTHWEST ACROSS POLISHING POND, STEEP SLOPES, TALL AND SOME BRUSHY VEGETATION

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TITLE
INTERSTATE POWER AND LIGHT COMPANY
SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA
POLISHING POND SITE PHOTOS

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PP-3
LOOKING NORTHWEST ACROSS POLISHING POND, STEEP/BARE
INTERIOR SLOPES, RECENT REPAIR (RIP-RAP) ON EAST DIKE



PP-4
LOOKING NORTH AT CREST AND US SLOPE OF EAST DIKE OF POLISHING POND, RECENT REPAIR (RIP-RAP) ON EAST DIKE

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TITLE
INTERSTATE POWER AND LIGHT COMPANY
SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA
POLISHING POND SITE PHOTOS

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PP-5
LOOKING NORTHEAST AT TOP END OF POLISHING POND.
BRUSHY VEGETATION ON INTERIOR SLOPES



PP-6
LOOKING SOUTHWEST AT WEIR AND OVERFLOW AREA
BETWEEN SECONDARY AND POLISHING POND

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ASSESSMENT OF DAM SAFETY OF COAL COMBUSTION SURFACE IMPOUNDMENTS

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INTERSTATE POWER AND LIGHT COMPANY
SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA
POLISHING POND SITE PHOTOS

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DP-1
DISCHARGE POND OUTLET STRUCTURE AND
EMERGENCY OVERFLOW INLET



DP-2 LOOKING SOUTH AT DISCHARGE POND PARTIAL FLUME INLET WITH SOLAR POWERED FLOW METER

699 Commonwealth Center 11009 Bluegrase Performy Louisville, Ky 40299



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

PROJECT
ASSESSMENT OF DAM SAFETY OF COAL COMBUSTION SURFACE IMPOUNDMENTS
TITLE
INTERSTATE POWER AND LIGHT COMPANY
SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA
DISCHARGE POND SITE PHOTOS

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DATUM: DATE: 7/13/11

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DP-3 **DISCHARGE POND OUTLET STRUCTURE**



DP-4 **BUBBLER POOL/OUTLET DITCH**

690 Commonwealth Center 11003 Bluegrass Parkway Louisville, Ky 40299 (502) 267-0700



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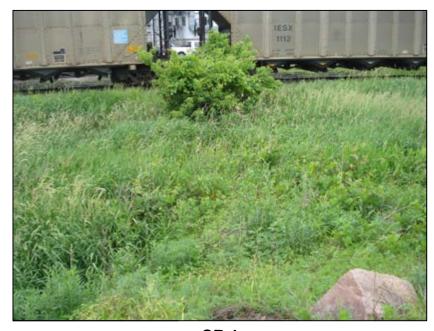
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PROJECT
ASSESSMENT OF DAM SAFETY OF COAL COMBUSTION SURFACE IMPOUNDMENTS

INTERSTATE POWER AND LIGHT COMPANY SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA **DISCHARGE POND SITE PHOTOS**

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OP-1
TREE MARKS LOCATION OF INLET OF OUTLET DITCH PIPE FROM PROPERTY



OP-2
SURFACE DRAINAGE CATCH BASIN AND MANHOLE FOR POND OUTLET
DITCH ON WEST SIDE OF PLANT PROPERTY

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PROJECT
ASSESSMENT OF DAM SAFETY OF COAL COMBUSTION SURFACE IMPOUNDMENTS
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INTERSTATE POWER AND LIGHT COMPANY
SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA
OUTLET PIPE/DITCH SITE PHOTOS

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OP-3 LOOKING SOUTH AT OUTLET PIPE TO ROADSIDE DITCH, CORRODED CMP PIPE



OP-4 LOOKING EAST AND DOWNSTREAM OF ROADSIDE DITCH

690 Commonwealth Center 11003 Bluegrass Parkway Louisville, Ky 40299 (502) 267-0700



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

PROJECT
ASSESSMENT OF DAM SAFETY OF COAL COMBUSTION SURFACE IMPOUNDMENTS

INTERSTATE POWER AND LIGHT COMPANY
SUTHERLAND GENERATING STATION, MARSHALLTOWN, IA
OUTLET PIPE/DITCH SITE PHOTOS

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APPENDIX C INVENTORY OF PROVIDED MATERIALS

INVENTORY OF PROVIDED MATERIALS

2010 IDNR Inspection Suth NPDES.pdf

2011 clarify photos at pond discharge area.docx

2011 Pond Piping Elevations.pdf

Genco Standard Guide for Pond Inspections Revision 0.pdf

HHS Field Investigation Report - Complete.pdf

HHSI Options Analysis Report - Final 12_05.pdf

芃 IPL - Sutherland Generating Station Location Map.pdf

Map Property Boundary 2673_001.pdf

Map Property Parcels Photo.pdf

Marshalltown Ash Pond Analysis r2.pdf

🗖 Old Dwg 1959 location 1-2060-0-D-W0510.pdf

Old Dwg 1961 location.pdf

Phase I - Polishing Pond Design 4_3_06.pdf

🄁 Phase II - Final Design.pdf

RE Alliant Sutherland FTP Site.htm

Re Alliant Sutherland NPDES.htm

Re Marshalltown Ash Landfill, htm

SGS A5-3 WB-1.pdf
Sutherland 2006 NPDES Permit.pdf

Sutherland Ash Pond Inspection 04_21_2011.pdf

Sutherland Pond Inspection 11_20_2010.pdf

🔁 Sutherland Station narrative description.pdf

APPENDIX D SLOPE STABILITY AND HYDRAULIC ANALYSIS

CONFIDENTIAL BUSINESS INFORMATION



elemental design build solutions

June 17, 2011

Mr. William Skalitzky Alliant Energy 4902 N. Biltmore Lane Madison, WI 53718 154.006.005

Re: Ash Pond Slope Stability and Hydraulic Analysis Sutherland Generating Station – Marshalltown, IA

Mr. Skalitzky;

Aether dbs, reports our findings from the Ash Pond Slope Stability and Hydraulic Analysis performed for the Sutherland Generating Station. The purpose of the study is evaluation of the stability of the bottom ash settling ponds under 100-year storm flow and for both seismic and rapid drawdown induced loadings. The analysis is based on existing data on the generating station subsurface conditions, ash pond dike conditions, and surface drainage arrangements. The data pertinent to the evaluation is provided in the attachments.

The ash ponds are capable of routing a SCS Type II, 24-hour, 100 year storm without overtopping. The outer dikes of the ash pond have a factor of safety greater than the standard acceptable factor of safety of 1.5 for static stability and 1.0 for earthquake stability. The exterior dikes are constructed of clay and there is no rapid drawdown stability issue.

Background

The Sutherland Generating Station is a fossil-fueled electric generating plant consisting of three steam electric generators, three combustion turbine units, and two diesel oil generators. Coal is the primary fuel and each unit has the capability to use natural gas as a secondary fuel. The power plant's three units have a total rated capacity of 146 megawatts. The generating station including the coal stockpile and ash management facility are shown on Figure 1.

Bottom ash and fly ash from the coal fired boilers are sluiced to settling ponds east of the power plant at a flow rate of 700 gallons per minute. In addition, smaller quantities of cooling tower blow down, air compressor cooling water, and boiler blow down flow to the ash ponds. Bottom ash and fly ash settle in the ponds and are removed for beneficial reuse or disposal. The water from the ponds discharges through a 24-inch diameter circular overflow weir in the Northeast corner of the ash management area.

During storm events the pond also receives storm water runoff from the generating station and the coal storage pile.

In 2006, the secondary ash settling pond was reconfigured with the addition of a polishing pond at the Northeast corner and internal dikes were added within the main pond to lengthen the travel path and facilitate fly ash removal, Attachment A. The primary settling ponds are used to settle and remove ash on a regular basis. The secondary pond is used to settle the finer ash with less frequent removals. Discharge is through an NPDES permitted outfall.

Drainage

The coal pile has underground drain tiles which direct infiltration to the ash settling ponds. Storm water runoff from the powerhouse and the surrounding area is also directed to the ash ponds. For assessment of the storm water inflow to the ash pond, the plant area, the ash management area and the coal pile storm water is routed to the ash ponds. The storage lag that occurs in the coal pile underdrain system is not modeled and some areas of the plant that may not discharge directly to the ash ponds are included in the inflow to the ponds. The total area contributing to the ponds is 57 acres, Figure 1.

Hydrology and Hydraulics

The secondary ash settling pond overflows at elevation 862.4 feet. The polishing pond overflows at elevation 861.6 feet. The two ponds are separated by a lower elevation dike with a static mixing channel, Attachment A. During an extreme hydrological event, the small dike separating the secondary ash settling pond from the polishing pond will overtop and the two ponds will work together as a single pond with an approximate surface area of 6 acres.

After the polishing pond, water discharges through a flow monitoring flume to a small discharge pond with a circular overflow weir at elevation 860.4 feet. During a severe storm the water may overtop the internal weir of the small discharge pond to reach the overflow weir.

A 100-year, SCS Type 2, 24-hour storm for Marshall County, Iowa is 6.6 inches of precipitation¹. A runoff Curve Number of 89 was used in the storm hydrograph calculation. The curve number is based on weighting the relative percentages of ash, coal, grass, and industrial uses at the generating station. A hydraulic length of 1920 feet was used for the longest flow path to the ponds, Attachment B.

Hydraflow by Intelisolve² was used to generate and route the storm hydrograph through the secondary settling pond, the polishing pond and finally the small discharge pond. The starting pond elevation was specified as the normal water elevation of 862.4 feet in the secondary ash pond and 861.6 feet in the polishing pond. The reservoir routing model predicts a maximum rise to water elevation 864.4 feet during the storm leaving a freeboard of slightly more than 6-inches, Attachment B. The discharge pond reaches a storm elevation of 862.5 feet which is 1.5 feet below the outer dike height of 864 feet.

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¹ United States Department of Commerce, Rainfall Frequency Analysis of the United States,

² Intelisolve. Pond Routing Software Hydraflow, 2002

Sutherland Generating Station Personnel³ report that the site received four inches of rainfall on November 4, 2003 and the water level in the secondary ash pond rose only 6 to 7 inches above the normal operating elevation. The historical event indicates that the analysis is conservative.

Ash Pond Dike Stability

Surface soil in the ash management area is Zook Clay (low plasticity clay with 5-7% organic content) USCS Marshall County Soil Survey⁴. During an investigation of the ash pond dikes in 2006 by Hard Hat Services the dikes were found to be constructed of the Zook Clay, Attachment A. Field characterizations of the clay unconfined compressive strength made with a pocket penetrometer are shown on the five boring logs from the outer dike of the ash pond. The cohesive strength of the clay (unconfined compressive strength divided by 2) is charted versus depth in Attachment C. All five borings produced similar strength results showing a strong crust (very stiff to hard clay above a depth of 4 feet) with stiff to firm clay underneath.

Two dimensional limit equilibrium slope stability analyses were performed on a conservative idealized cross-section that corresponds best with the outer dike along the southern edge of the active fly ash management area, Figure 1. The southern dike is a little narrower than the eastern outer dike and presumed higher, because the natural topography slopes slightly to the south, Attachment D. Two to one side slopes were specified for the reconstruction of the inside of the secondary ash pond and the available topographic information indicates that the outside dike slopes were also built at a two horizontal to one vertical slope.

The specified height of the dike in the idealized cross-section is 13 feet based on the maximum depth to native soils reported in the 2006 field investigation. The crest of the dike is at 865 feet and the toe is at 852 feet for a 13 foot height. The bottom of the ash pond adjacent to the southernmost dike is within the range of 851 feet to 855 feet. The 13 foot top width of the idealized dike is the narrowest width measured on the Settling Pond Reconfiguration Drawing, Attachment A.

The slope stability analysis assumes that the clay cohesion in the dike is the lowest strength measured above a depth of 14 feet, 1,250 pounds per square foot (psf), and the cohesion below the dike is the lowest strength measured below a depth of 13 feet, 1,000 psf, Attachment C.

Fine to medium sand with silt is present below the clay in the five nearest deep borings at elevations ranging from 848 feet to 852 feet, Attachment E and F. The search for failure surfaces in the Zook Clay was limited to a depth of 9 feet below the toe of the dike to avoid the stronger sand below that depth. The sand is relatively dense and will not liquefy in a low intensity earthquake.

³ Correspondence with Mr. George Kueny of Sutherland Generating Station sent February 13, 2006.

⁴ Soil Survey, Marshall County, Iowa, United States Soil Conservation Service

The depth to rock is over 250 feet as shown by the Well Record for Well Number 6A, Attachment G. Well Number 6A is located on Figure 1.

Program STABL5M (1996) from Purdue University⁵ was used to analyze hundreds of potential slip surfaces for each loading case. The program calculates a factor of safety based on the ratio of the driving forces to the resisting forces along each potential slip surface. A calculated factor of safety greater than one indicates stability along the surface analyzed. Because the dike foundation soils are considered weaker than the dike, the most critical surface mode is a sliding block failure as shown in Attachment H.

Only two loading cases / failure scenarios were analyzed because in the case of a clay dike, the rapid drawdown case on the inside of the pond is essentially the same as the stability of the outside of the dike. (Clay soils cannot drain quickly; hence short term seepage forces are not a concern.)

- 1.) Ash pond water elevation at the normal elevation (862.6 feet) with a steady state seepage face emerging above the toe of the slope. Because a cohesion only strength is considered using undrained clay strength, the location of the seepage face does not influence the Factor of Safety calculation. However, water pressure on the inside of the dike can contribute to instability and it was included in the model.
- 2.) The small ponds at Sutherland Station do not pose a significant risk and contain minimum volumes of coal combustion residue. The procedures of FEMA⁶ suggest that the structures rate as low risk dams. For low risk structures, a probability of 10% in 50 years (return period of 475 years) is an acceptable standard. Consequently, a pseudo-static earthquake analysis was completed using the effective peak ground acceleration for a 475 year return period⁷. With dense soil under the site, a Site Class "D" was selected for soil amplification giving a probable maximum horizontal earthquake acceleration of 0.019g for the ash ponds. The vertical earthquake force is specified as ²/₃ of the horizontal earthquake force⁸.

The ten most critical potential failure surfaces for each loading case are shown in Attachment H. The lowest Factor of Safety for each case is:

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⁵ STABL User Manual, By Ronald A. Siegel, Purdue University, June 4, 1975 and STABL5 ...The SPENCER Method of Slices: Final Report, By J.R.Carpenter, Purdue University, August 28, 1985

⁶ Federal Emergency Management Agency, "Federal Guidelines for Dam Safety", May 2005

⁷ U.S. Army Engineer Research and Development Center, Vicksburg, MS., "DEQAS-R: Standard response spectra and effective peak ground accelerations for seismic design and evaluation" Yule, D. E. Kala, R., and Matheu, E. E. (2005),

⁸ N.M.Newmark and W.J.Hall, "Procedures and Criteria for Earthquake Resistant Design", Building Science Series No. 46, National Bureau of Standards, U.S. Dept. of Commerce, Washington, D.C., 1973

Dike Stability Loading Case	Minimum Factor of Safety
Static Conditions with Seepage Face	3.4
Earthquake with Seepage Face	3.2
Rapid Draw Down	NA

Conclusion

The secondary ash pond working in conjunction with the polishing pond can pass a 100-year 24-hour storm without overtopping.

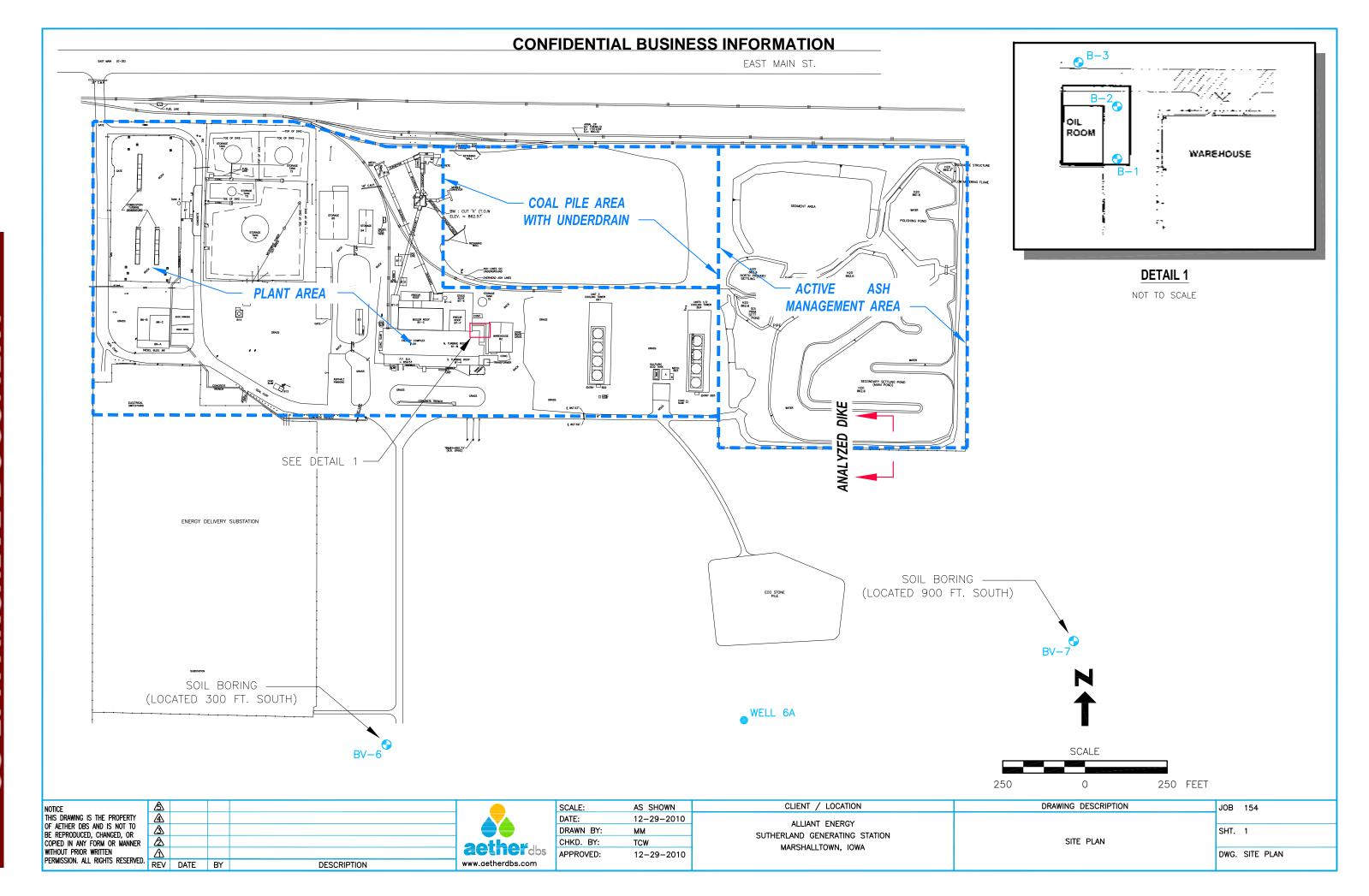
The stability of the outer dike on the ponds is greater than the acceptable Factor of Safety standard of 1.5 for static conditions⁹. The outer dike also shows a Factor of Safety greater than the normally acceptable standard for Earthquake conditions (factor of safety greater than 1.0).

Respectfully Submitted,

Thomas C. Wells, P.E.

Timothy J. Harrington, P.E.

 $^{^9}$ USACE," Engineering Design Slope Stability, EM 1110-2-1902", Table 3-1 $\,$

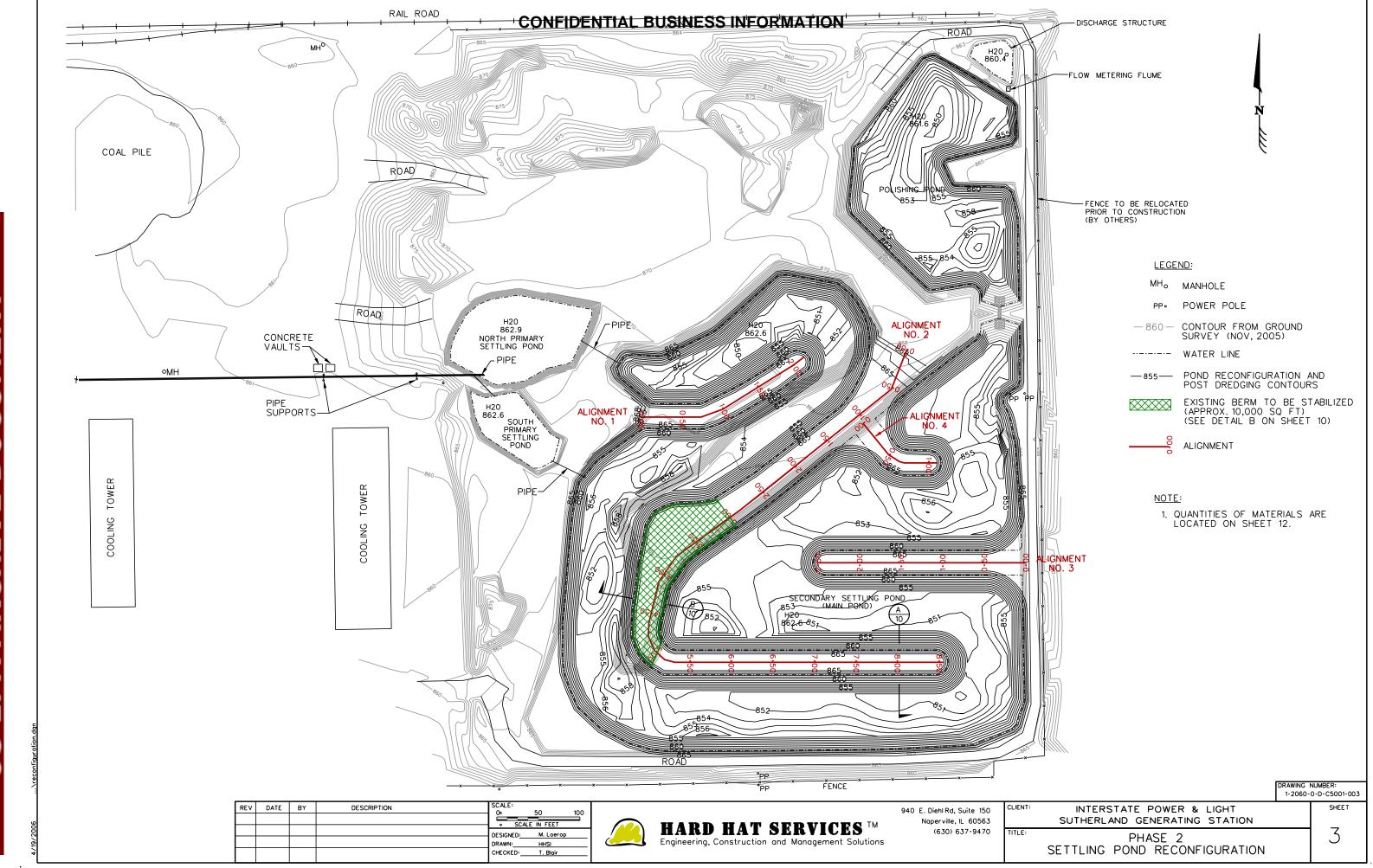


Attachment A

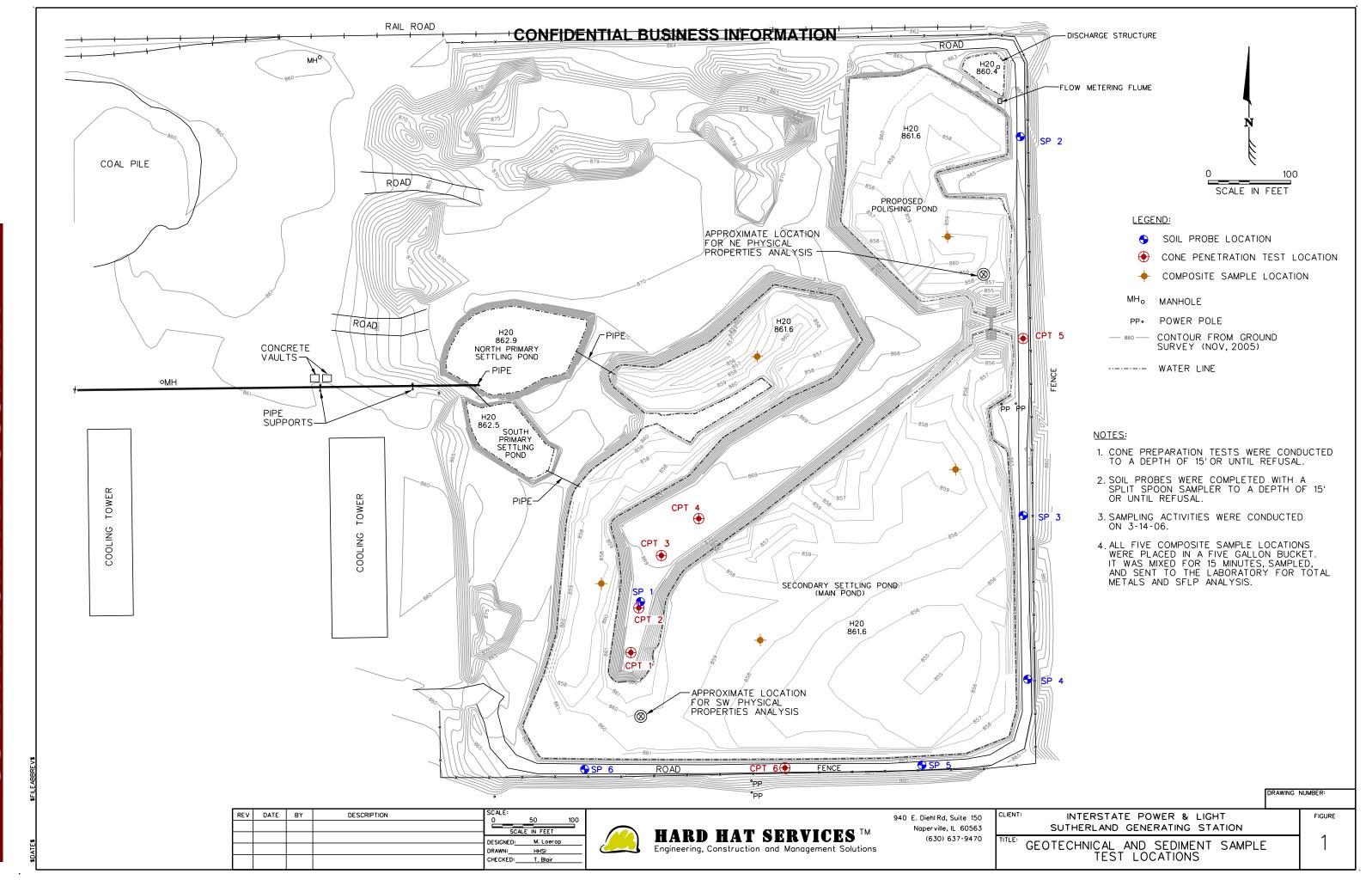
Field Investigation Report
Sutherland Generating Station
Bottom Ash Settling Pond

Source: Hard Hat Services, March 31, 2006

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CONFIDENTIAL BUSINESS INFORMATION

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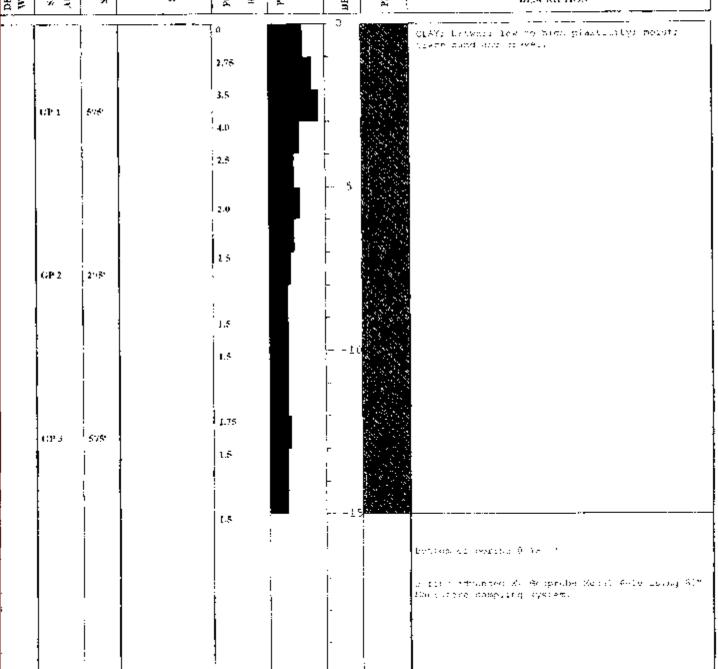
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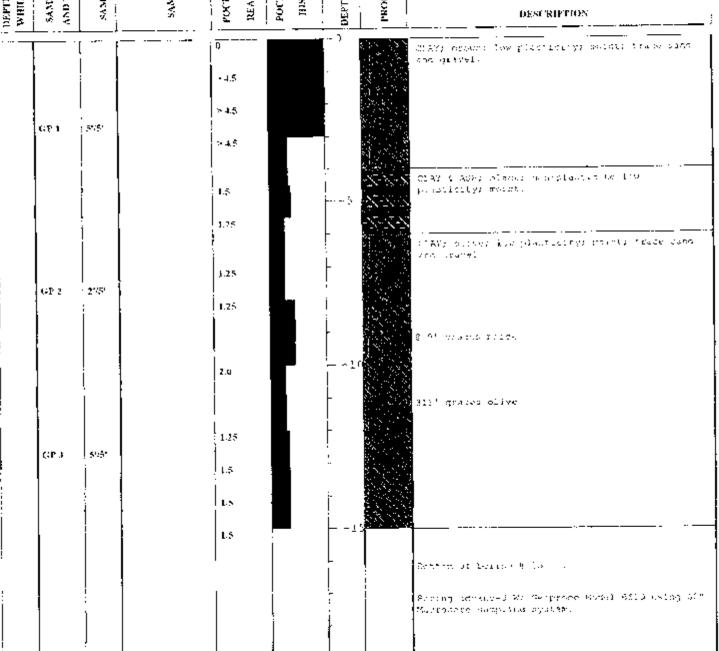
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Attachment B

Hydrological and Hydraulics Study

Aether dbs, December 31, 2010

Hydrograph Summary Reportal Business Information

Proj. file: Marshalltown2.gpw

Hyd. No.	Hydrograph type (origin)	Peak flow (cfs)	Time interval (min)	Time to peak (min)	Volume (acft)	Inflow hyd(s)	Maximum elevation (ft)	Maximum storage (acft)	Hydrograph description
	SCS Runoff	92.95	10	790	24.867				Sutherland Station
2	Reservoir	65.48	10	840	24.862	1	864.39	9.532	Through Secondary Pond
3	Reservoir	64.12	10	860	24.858	2	864.39	3.343	Polishing Pond
4	Reservoir	64.14	10	850	24.858	3	862.51	0.061	Discharge Pond

Return Period: 100 yr

Hydraflow Hydrographs by Intelisolve

Run date: 12-31-2010

Hyd. No. 1

Sutherland Station

Hydrograph type = SCS Runoff Peak discharge = 92.95 cfsStorm frequency = 100 yrsTime interval = 10 min Drainage area = 57.00 acCurve number = 89 Basin Slope = 0.1 % Hydraulic length = 1920 ftTc method = LAG Time of conc. (Tc) = 130.6 min Total precip. = 6.60 inDistribution = Type II Storm duration = 484 = 24 hrs Shape factor

Hydrograph Volume = 24.867 acft

Hydrograph Discharge Table

Time Outflow		Time (Outflow	Time (Outflow	Time (Outflow
(hrs	cfs)	(hrs	cfs)	(hrs	cfs)	(hrs	cfs)
6.00	0.95	11.67	14.06	17.33	9.12	23.00	4.45
6.17	1.08	11.83	19.20	17.50	8.83	23.17	4.42
6.33	1.21	12.00	28.89	17.67	8.56	23.33	4.39
6.50	1.35	12.17	39.07	17.83	8.31	23.50	4.36
6.67	1.50	12.33	49.53	18.00	8.08	23.67	4.33
6.83	1.64	12.50	60.09	18.17	7.87	23.83	4.30
7.00	1.79	12.67	70.50	18.33	7.67	24.00	4.27
7.17	1.94	12.83	80.64	18.50	7.49	24.17	4.20
7.33	2.10	13.00	89.18	18.67	7.32	24.33	4.07
7.50	2.25	13.17	92.95 <<	18.83	7.15	24.50	3.90
7.67	2.41	13.33	89.25	19.00	6.99	24.67	3.68
7.83	2.57	13.50	84.60	19.17	6.84	24.83	3.42
8.00	2.73	13.67	79.23	19.33	6.69	25.00	3.11
8.17	2.89	13.83	73.40	19.50	6.54	25.17	2.76
8.33	3.06	14.00	67.27	19.67	6.39	25.33	2.36
8.50	3.24	14.17	60.89	19.83	6.24	25.50	1.99
8.67	3.44	14.33	54.35	20.00	6.09	25.67	1.65
8.83	3.65	14.50	47.68	20.17	5.94	25.83	1.35
9.00	3.88	14.67	40.94	20.33	5.79	26.00	1.08
9.17	4.14	14.83	34.21	20.50	5.65		
9.33	4.42	15.00	27.53	20.67	5.51		
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9.67	5.03	15.33	17.12	21.00	5.26		
9.83	5.37	15.50	15.63	21.17	5.14		
10.00	5.73	15.67	14.48	21.33	5.04		
10.17	6.11	15.83	13.58	21.50	4.94		
10.33	6.53	16.00	12.82	21.67	4.86		
10.50	6.99	16.17	12.16	21.83	4.79		
10.67	7.51	16.33	11.58	22.00	4.72		
10.83	8.11	16.50	11.06	22.17	4.66		
11.00	8.82	16.67	10.60	22.33	4.61		
11.17	9.63	16.83	10.17	22.50	4.57		
11.33	10.63	17.00	9.79	22.67	4.52		
11.50	11.85	17.17	9.44	22.83	4.49		

Reservoir Report CONFIDENTIAL BUSINESS INFORMATION

Reservoir No. 1 - Secondary

Pond Data

Pond storage is based on known values

Stage / Storage Table

Stage (ft)	Elevation (ft)	Contour area (sqft)	Incr. Storage (acft)	Total storage (acft)
0.00	862.40	00	0.000	0.000
1.00	863.40	00	4.800	4.800
2.00	864.40	00	4.800	9.600
3.00	865.40	00	4.800	14.400

Culvert / Orifice Structures Weir Structures [B] [C] [A] [B] [C] [A] [D] [D] Rise in = 0.00.0 0.0 0.0 = 2.00 20.00 0.00 0.00 Crest Len ft = 0.0 Span in 0.0 0.0 0.0 Crest El. ft = 862.40 863.40 0.00 0.00 No. Barrels = 0 0 0 0 Weir Coeff. = 2.602.60 0.00 0.00 Invert El. ft = 0.000.00 0.00 0.00 Weir Type = Broad Broad Length ft = 0.00.0 0.0 0.0 Multi-Stage = No No No No Slope % = 0.000.00 0.00 0.00 N-Value = .000 .000 .000 .000 Orif. Coeff. = 0.000.00 0.00 0.00 Exfiltration Rate = 0.00 in/hr/sqft Tailwater Elev. = 0.00 ft Multi-Stage = n/aNo No No

Note: All outflows have been analyzed under inlet and outlet control.

Stage /	Storage /	Discharge	Table
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Stage ft	Storage acft	Elevation ft	Clv A cfs	CIv B cfs	Clv C cfs	Clv D cfs	Wr A cfs	Wr B cfs	Wr C cfs	Wr D cfs	Exfil cfs	Total cfs
	uon		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.00	0.000	862.40					0.00	0.00				0.00
0.10	0.480	862.50					0.16	0.00				0.16
0.20	0.960	862.60					0.46	0.00				0.46
0.30	1.440	862.70					0.85	0.00				0.85
0.40	1.920	862.80					1.32	0.00				1.32
0.50	2.400	862.90					1.84	0.00				1.84
0.60	2.880	863.00					2.42	0.00				2.42
0.70	3.360	863.10					3.04	0.00				3.04
0.80	3.840	863.20					3.72	0.00				3.72
0.90	4.320	863.30					4.44	0.00				4.44
1.00	4.800	863.40					5.20	0.00				5.20
1.10	5.280	863.50					6.00	1.64				7.64
1.20	5.760	863.60					6.84	4.65				11.48
1.30	6.240	863.70					7.71	8.54				16.25
1.40	6.720	863.80					8.61	13.15				21.76
1.50	7.200	863.90					9.55	18.38				27.93
1.60	7.680	864.00					10.52	24.16				34.68
1.70	8.160	864.10					11.52	30.44				41.97
1.80	8.640	864.20					12.56	37.19				49.75
1.90	9.120	864.30					13.62	44.38				58.00
2.00	9.600	864.40					14.71	52.00				66.71
2.10	10.080	864.50					15.82	59.99				75.81
2.20	10.560	864.60					16.97	68.35				85.32
2.30	11.040	864.70					18.14	77.07				95.21
2.40	11.520	864.80					19.33	86.13				105.46
2.50	12.000	864.90					20.55	95.52				116.07
2.60	12.480	865.00					21.80	105.23				127.02
2.70	12.960	865.10					23.07	115.24				138.31
2.80	13.440	865.20					24.36	125.56				149.92
2.90	13.920	865.30					25.68	136.16				161.84
3.00	14.400	865.40					27.02	147.08				174.10

Reservoir Report CONFIDENTIAL BUSINESS INFORMATION

Reservoir No. 2 - Polishing

Pond Data

Pond storage is based on known values

Stage / Storage Table

Stage (ft)	Elevation (ft)	Contour area (sqft)	Incr. Storage (acft)	Total storage (acft)
0.00	861.60	00	0.000	0.000
1.00	862.60	00	1.200	1.200
2.00	863.60	00	1.200	2.400
3.00	864.60	00	1.200	3.600

Culvert / Or	ifice Structu	res		Weir Structures					
	[A]	[B]	[C]	[D]		[A]	[B]	[C]	[D]
Rise in	= 0.0	0.0	0.0	0.0	Crest Len ft	= 1.00	24.00	0.00	0.00
Span in	= 0.0	0.0	0.0	0.0	Crest El. ft	= 861.60	863.50	0.00	0.00
No. Barrels	= 0	0	0	0	Weir Coeff.	= 2.60	2.60	0.00	0.00
Invert El. ft	= 0.00	0.00	0.00	0.00	Weir Type	= Broad	Broad		
Length ft	= 0.0	0.0	0.0	0.0	Multi-Stage	= No	No	No	No
Slope %	= 0.00	0.00	0.00	0.00					
N-Value	= .000	.000	.000	.000					
Orif. Coeff.	= 0.00	0.00	0.00	0.00					
Multi-Stage	= n/a	No	No	No	Exfiltration Rat	te = 0.00 in/hr/	sqft Tailwa	ter Elev. =	= 0.00 ft

Note: All outflows have been analyzed under inlet and outlet control.

Stage / 3	Storage /	Discharge	Table
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Stage	Storage	Elevation	Clv A	Clv B	Clv C	Clv D	Wr A	Wr B	Wr C	Wr D	Exfil	Total
ft	acft	ft	cfs cfs	cfs	cfs							
0.00	0.000	861.60					0.00	0.00				0.00
0.10	0.120	861.70					0.08	0.00				0.08
0.20	0.240	861.80					0.23	0.00				0.23
0.30	0.360	861.90					0.43	0.00				0.43
0.40	0.480	862.00					0.66	0.00				0.66
0.50	0.600	862.10					0.92	0.00				0.92
0.60	0.720	862.20					1.21	0.00				1.21
0.70	0.840	862.30					1.52	0.00				1.52
0.80	0.960	862.40					1.86	0.00				1.86
0.90	1.080	862.50					2.22	0.00				2.22
1.00	1.200	862.60					2.60	0.00				2.60
1.10	1.320	862.70					3.00	0.00				3.00
1.20	1.440	862.80					3.42	0.00				3.42
1.30	1.560	862.90					3.85	0.00				3.85
1.40	1.680	863.00					4.31	0.00				4.31
1.50	1.800	863.10					4.78	0.00				4.78
1.60	1.920	863.20					5.26	0.00				5.26
1.70	2.040	863.30					5.76	0.00				5.76
1.80	2.160	863.40					6.28	0.00				6.28
1.90	2.280	863.50					6.81	0.00				6.81
2.00	2.400	863.60					7.35	1.97				9.33
2.10	2.520	863.70					7.91	5.58				13.49
2.20	2.640	863.80					8.48	10.25				18.73
2.30	2.760	863.90					9.07	15.78				24.85
2.40	2.880	864.00					9.67	22.05				31.72
2.50	3.000	864.10					10.28	28.99				39.27
2.60	3.120	864.20					10.90	36.53				47.43
2.70	3.240	864.30					11.53	44.63				56.17
2.80	3.360	864.40					12.18	53.26				65.44
2.90	3.480	864.50					12.84	62.38				75.22
3.00	3.600	864.60					13.51	71.99				85.50

Reservoir Report CONFIDENTIAL BUSINESS INFORMATION

Reservoir No. 3 - Discharge Pond

Pond Data

Pond storage is based on known values

Stage / Storage Table

Stage (ft)	Elevation (ft)	Contour area (sqft)	Incr. Storage (acft)	Total storage (acft)
0.00	860.40	00	0.000	0.000
1.00	861.40	00	0.029	0.029
2.00	862.40	00	0.029	0.058
3.00	863.40	00	0.029	0.087
4.00	864.40	00	0.029	0.116

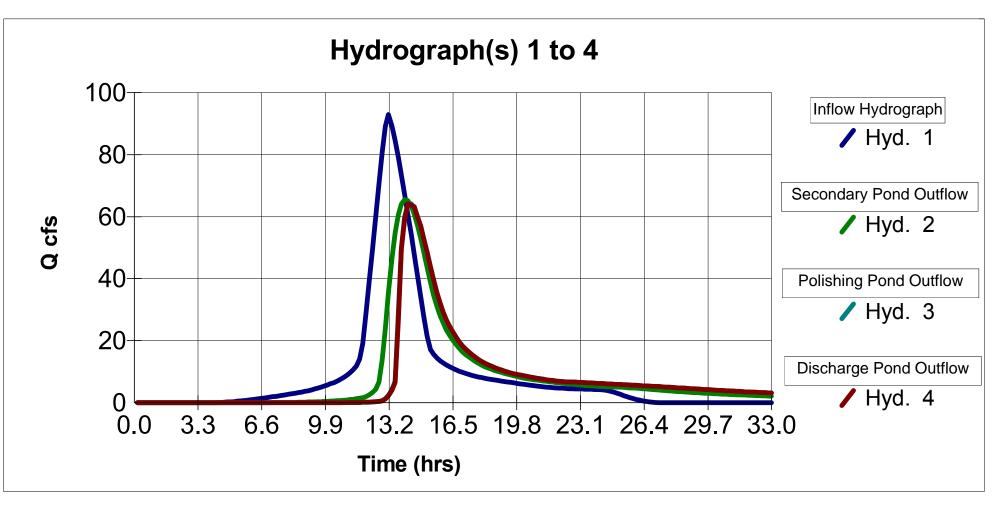
Culvert / Orifice Structures Weir Structures [A] [B] [C] [D] [A] [B] [C] [D] = 0.0 0.0 0.0 0.0 = 6.30 0.00 0.00 0.00 Rise in Crest Len ft = 0.0 0.0 0.0 0.0 = 860.40 0.00 0.00 0.00 Span in Crest El. ft = 0 0 0 0 = 3.33 0.00 0.00 0.00 Weir Coeff. No. Barrels = 0.000.00 0.00 0.00 = Riser Invert El. ft Weir Type Length ft = 0.0 0.0 0.0 0.0 Multi-Stage = No No No No = 0.000.00 0.00 0.00 Slope % = .000 .000 .000 .000 N-Value = 0.000.00 0.00 0.00 Orif. Coeff. Multi-Stage = n/aNo No No Exfiltration Rate = 0.00 in/hr/sqft Tailwater Elev. = 0.00 ft

Note: All outflows have been analyzed under inlet and outlet control.

Stage ft	Storage acft	Elevation ft	Clv A cfs	Clv B cfs	Clv C cfs	Clv D cfs	Wr A cfs	Wr B cfs	Wr C cfs	Wr D cfs	Exfil cfs	Total cfs
0.00	0.000	860.40					0.00					0.00
0.10	0.003	860.50					0.66					0.66
0.20	0.006	860.60					1.88					1.88
0.30	0.009	860.70					3.45					3.45
0.40	0.012	860.80					5.31					5.31
0.50	0.015	860.90					7.41					7.41
0.60	0.017	861.00					9.75					9.75
0.70	0.020	861.10					12.28					12.28
0.80	0.023	861.20					15.01					15.01
0.90	0.026	861.30					17.91					17.91
1.00	0.029	861.40					20.98					20.98
1.10	0.032	861.50					24.20					24.20
1.20	0.035	861.60					27.58					27.58
1.30	0.038	861.70					31.09					31.09
1.40	0.041	861.80					34.75					34.75
1.50	0.044	861.90					38.54					38.54
1.60	0.046	862.00					42.45					42.45
1.70	0.049	862.10					46.49					46.49
1.80	0.052	862.20					50.66					50.66
1.90	0.055	862.30					54.93					54.93
2.00	0.058	862.40					59.34					59.34
2.10	0.061	862.50					63.84					63.84
2.20	0.064	862.60					68.45					68.45
2.30	0.067	862.70					73.17					73.17
2.40	0.070	862.80					78.00					78.00
2.50	0.073	862.90					82.92					82.92
2.60	0.075	863.00					87.94					87.94
2.70	0.078	863.10					93.07					93.07
2.80	0.081	863.20					98.28					98.28
2.90	0.084	863.30					103.59					103.59
3.00	0.087	863.40					109.01					109.01
3.10	0.090	863.50					114.50					114.50
3.20	0.093	863.60					120.09					120.09

Continues on next page...

Discharge Pond Stage / Storage / Discharge Table											Page 2	
Stage ft	Storage acft	Elevation ft	CIv A cfs	CIv B cfs	Clv C cfs	Clv D cfs	Wr A cfs	Wr B cfs	Wr C cfs	Wr D cfs	Exfil cfs	Total cfs
3.30	0.096	863.70					125.76					125.76
3.40	0.099	863.80					131.52					131.52
3.50	0.102	863.90					137.36					137.36
3.60	0.104	864.00					143.29					143.29
3.70	0.107	864.10					149.30					149.30
3.80	0.110	864.20					155.39					155.39
3.90	0.113	864.30					161.56					161.56
4.00	0.116	864.40					167.83					167.83
End												



Note: Hydrographs 3 & 4 are almost identical.

Curve Number Calcs.xls

CONFIDENTIAL BUSINESS INFORMATION

Alliant Energy near Marshalltown - Sutherland Station Ash Pond Analysis 154.006.005

Curve Number (CN) Calculation

Group D soils assumed (clay soils)

Plant Drainage Area => approximates a rectangle (see working drawing)

Total Drainage Area = 10.8" * 240'/" * 4" * 240'/" * acres / 43,560 SF = 57 acres (Conservative)

	Χ	Υ		SF	Acres	(CN
Total		10.8	4	248832	20	57.1	89

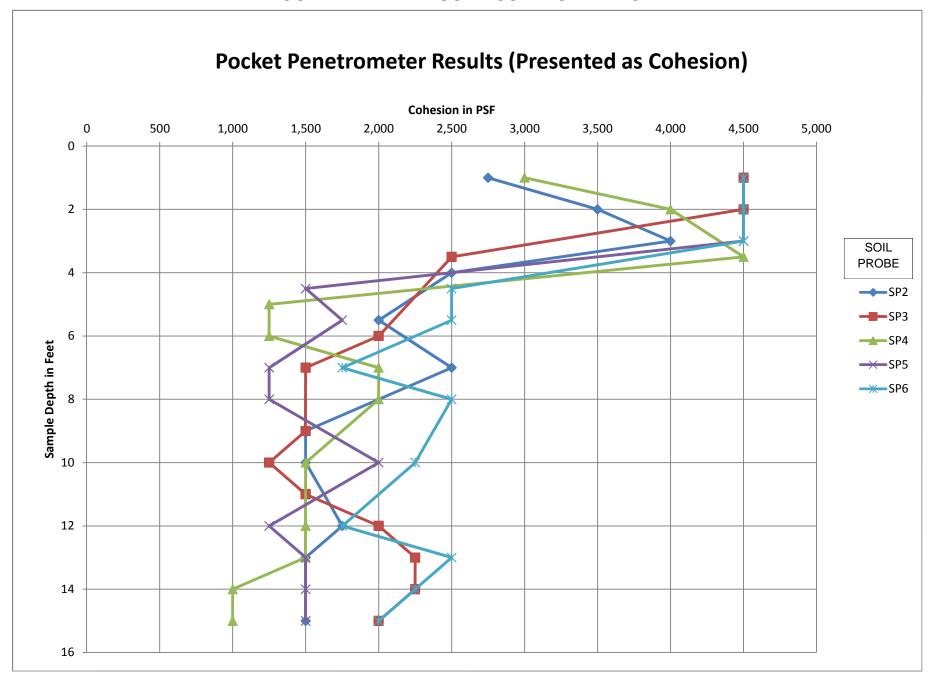
Different Areas have different Curve Numbers => areas approximated as rectangles

Ash	3	4	691200	15.9	91 Gravel Road
Coal	3.1	1.6	285696	6.6	91 Gravel Road
Grass	2.4	1.9	262656	6.0	80 grass cover > 75%
Grass	1.6	1.5	138240	3.2	80 grass cover > 75%
Difference (Ro	ck, concrete	, asphalt,	25.5	91 Industrial CN	

Attachment C

CABENO Environmental Field Services, LLC 2006 Pocket Penetrometer Results

Strength data presented in Appendix A charted by Aether dbs, December 30th, 2010

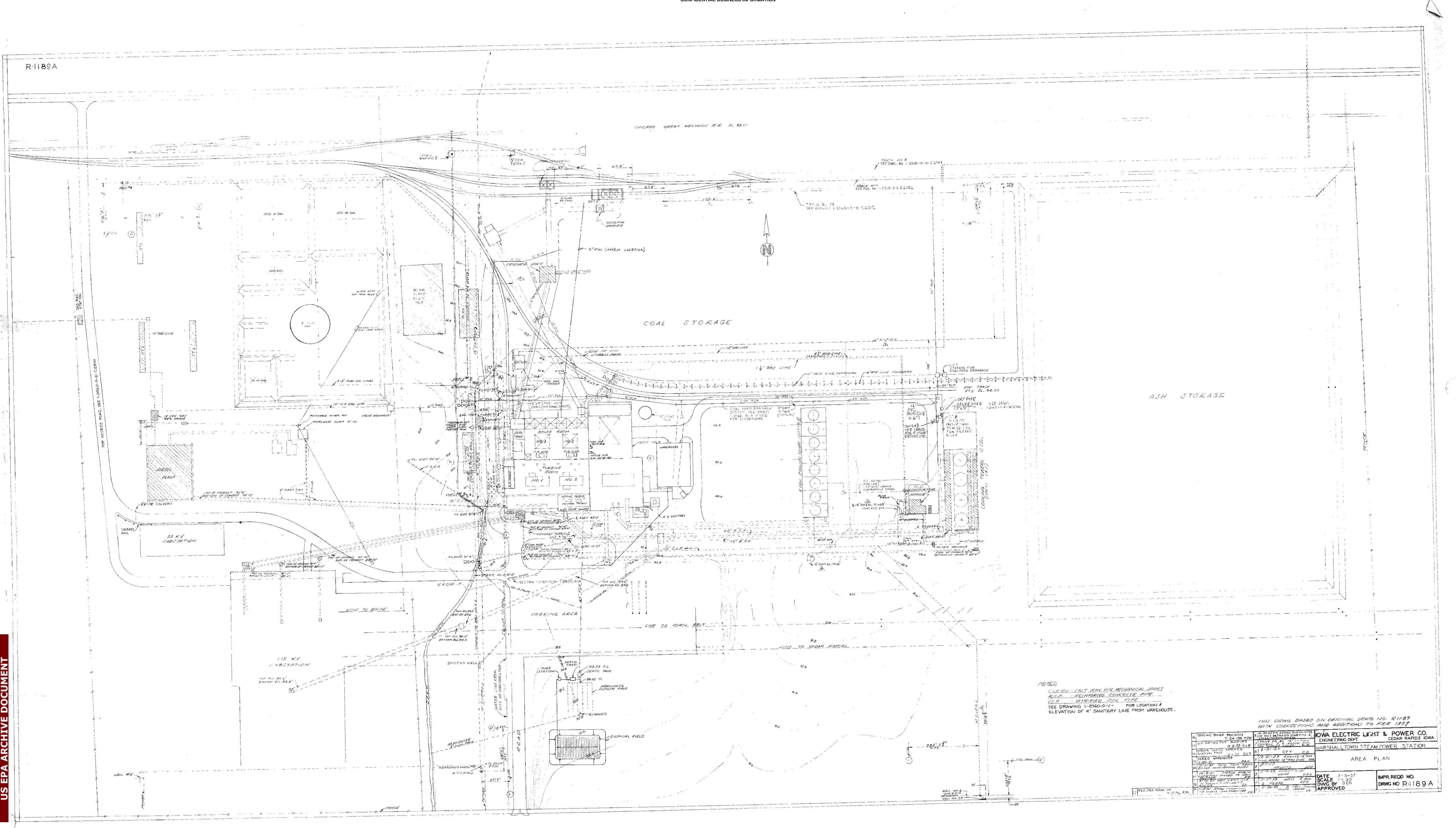


Attachment D

Area Plan

Marshalltown Steam Power Station

Source: lowa Light & Power Company 1957 Drawing



Attachment E

Selected Deep Soil Borings Sutherland Generating Station

Source:
Preliminary Subsurface Investigation
Black & Veatch, May 14, 2007

BUSINESS INFORMATION CONFIDENTIAL BORING NO. BV-6 BLACK & VEATCH SHEET 1 OF 3 CLIENT PROJECT PROJECT NO. Interstate Power & Light Sutherland Station 145491 PROJECT LOCATION COORDINATES GROUND ELEVATION (DATUM) TOTAL DEPTH E 5095039.01 N 3479395.0° Marshalltown, Iowa 856.6 ft (MSL) 80.5 (feet) SURFACE CONDITIONS COORDINATE SYSTEM DATE START DATE FINISHED Flat, grassy marsh, standing water, offset 28' south State Plane 04/13/07 04/14/07 LOGGED BY CHECKED BY SOIL SAMPLING APPROVED BY ve 🛩 SAMPLE RECOVERY 3RD 6 INCHES R. S. Edwards V. Bhadriraju v& E. Meyer SAMPLE NUMBER SET S INCHES VALUE **ÉLEVATION (FEET)** SAMPLE TYPE 8 **ROCK CORING** CLASSIFICATION OF MATERIALS REMARK\$ ROD RECOVERY RUN RECOVERY GRAPHIC RUN RUNBER DEPTH ş Silty <u>CLAY</u>; dark gray; moist; low plasticity; (TOPSOIL). Boring advanced 868 w/4-1/4" 1D hollow stem auger, SPT <u>CLAY</u>; yellow-brown; moist, high plasticity performed w/ TW 1.6 automatic hammer. grading gray w/some brown mottling **8**62 TW 2 1.5 ¥ Water 850 encountered @ 6" during drilling. SAND; brownish-yellow; loose; wet; medium to coarse SPT 3 3 3 5 8 1.5 grained; well graded; rounded 848 grading medium dense SPT 3 5 7 12 0.7 845 SPT 5 5 7 8 15 0 Below 11.51 12 continued w/ 844 2-15/16" Incone roller bit using bentonite mud as grading loose drilling fluid SPT 0 В B 8.18 grading medium dense SPT 7 7 7 D 14 20 838 22 834 IPSL - Sutherland Sigger 24 grading loose 612 SPT ₿ 5 3 7 0.7 28 830 28 104 PM 828 SPT 0.8 9 ð 10 15 25 5/11/2007 30 grading medium dense; medium to fine grained; rounded. Driller reports to subrounded; w/rounded cobbles cobbles.

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CONFIDENTIAL BUSINESS INFORMATION BORING NO. BV-6 BLACK & VEATCH SHEET 2 OF 3 CLIENT PROJECT PROJECT NO. Interslate Power & Light
ON COORDINATES 145491 Sutherland Station PROJECT LOCATION **GROUND ELEVATION (DATUM)** TOTAL DEPTH N 3479395.0° E 5095039.01 Marshalltown, Iowa 856.6 ft (MSL) 80.5 (feet) SURFACE CONDITIONS DATE FINISHED **COORDINATE SYSTEM** DATE START Flat, grassy marsh, standing water, offset 28' south soil sampling LOGGED BY State Plane 04/13/07 04/14/07 CHECKED BY APPROVED BY UR 🎮 بسعرج S INCHES 3RD 8 INCHES SAMPLE NUMBER SET S INCHES R. S. Edwards V. Bhadriraju E. Meyer SAMPLE RECOVERY çç SAMPLE TYPE NA.UE ELEVATION (FEET) SAMPLE TYPE GRAPHIC LOG DEPTH (FEET) ROCK CORING **CLASSIFICATION OF MATERIALS** REMARKS RECOVERY RCD RECOVERY RUN LENGTH PERCENT RECOVERY NUMB 8 12 824 34 grading fine to coarse grained; fine to coarse, angular 822 SPT 10 11 22 0.5 в 11 gravel 36 820 36.7' to 37.3' gravel lense Gravat lense based on drilling 38 resistance. 818 SPT 11 6 6 5 0.8 11 40 42 814 Silly <u>SAND</u>; dark gray; medium dense; wet; fine grained; ŞPT 812 12 3 Ç 7 8.0 13 poorly graded 46 810 43 aoa <u>SILT</u>; dark gray; very stiff; moist; low plasticity; SPT 13 13 12 25 1.4 60 w/trace sand (Glacial Till) BD6 Б2 804 TW 14 recovered 802 w/split spoon. TW 14 a PP = 1.5 tsf 56 800 58 798 T∖V 16 Û 60 100 62

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BLACK & VEATCH CONFIDENTIAL BUSINESS INFORMATION SHEET 3 OF 3 CLIENT PROJECT PROJECT NO. Interstate Power & Light Sutherland Station 145491 PROJECT LOCATION COORDINATES GROUND ELEVATION (DATUM) TOTAL DEPTH N 3479395.01 E 5095039.0° 856.6 ft (MSL) 80.5 (feet) <u>Marshalltown, Iowa</u> SURFACE CONDITIONS COORDINATE SYSTEM DATE START DATE FINISHED Flat, grassy marsh, standing water, offset 28' south State Plane 04/13/07 04/14/07 LOGGED BY CHECKED BY APPROVED BY SOIL SAMPLING ve jw 2ND 6 INCHES بعرح SAMPLE RECOVERY SAMPLE NUMBER SET 6 INCHES 3RD INCHES V. Bhadriraju E. Meyer R. S. Edwards SAMPLE TYPE N VALUE ELEVATION (FEET) SAMPLE TYPE GRAPHIC LOG DEPTH (FEET) ROCK CORING CLASSIFICATION OF MATERIALS REMARK\$ RQD RECOVERY PERCENT RECOVERY RECOVERY RUN LENGTH NUMBER 2 80 줎 84 PP = 1.5 to192 SPT 18 6 8 8 16 1.4 2.0 tsf 88 68 780 grading stiff TW 16A recovered w/splrt 70 18A Ð 50000. $PP = 1.75 \, tsf$ 72 784 74 grading very stiff PP = 2.25 (sf. 782 ŞPŢ 7 19 8 10 19 1.4 75 780 PP = 3.0 tsfTW 20 78 1.0 778 PP = 2.5 tsfSPT 21 ₽ 9 9 18 1.0 80 Bottom of bonng @ 80.5". Water level not 82 recorded. Bonng 774 backfilled w/ cement bentonite 84 grout on 04/14/07 772 88 770 68 768 80 766 92 764

BORING NO. BV-6

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CONFIDENTIAL BUSINESS INFORMATION BORING NO. BV-7 SHEET 1 OF 3 CLIENT PROJECT PROJECT NO. Interstate Power & Light Sutherland Station 145491 PROJECT LOCATION **COORDINATES** GROUND ELEVATION (DATUM) TOTAL DEPTH N 3479095.0 E 5097105.01 Marshalltown, Iowa 855.9 ft (MSL) 80.5 (feet) **DATE FINISHED** SURFACE CONDITIONS **COORDINATE SYSTEM** DATE START State Plane Agricultural field off access road 04/11/07 04/12/07 LOGGED BY CHECKED BY APPROVED BY SOIL SAMPLING V8 👉 Em SAMPLE RECOVERY R. S. Edwards V. Bhadriraju E. Meyer SET 6 INCHES SAMPLE N VALUE SAMPLI TYPE 3RD INCHE ELEVATION (FEET) SAMPLE TYPE 8 **БЕРТН (FEET)** ROCK CORING CLASSIFICATION OF MATERIALS REMARKS RUN RECOVERY RQD RECOVERY GRAPHIC PERCENT RECOVERY RUN NUMBER RUN Silty <u>CLAY</u>; dark gray; moist; low plasticity (TOPSOIL) Boring advanced w/4-1/2" ID hollow stem auger SPT 854 Silty CLAY; dark gray; moist; low plasticity performed w/ T₩ 1 1.5 automatic hammer. 852 Below 4' CLAY; gray-brown; mottled; moist; high plasticity. continued w/ ΤW 2 1.5 2-15/16" tricone 250 roller bit using bentonite mud as drilling fluid. T₩ 3 1.5 848 <u>SAND</u>; yellow-brown; loose; wet; fine to medium grained; well graded; w/rounded to subrounded gravel. SPT 2 Э 3 6 1.0 12 SPT 5 5 4 9 8.0 5 842 grading medium dense. SPT 7 7 6 6 14 06 840 18 8.38 18 grading loose SPT 7 5 2 0.8 6 836 20 334 22 Driller reports B32 24 cobbles @ 23.4'. grading w/cobbles SPT ₿ 3 4 4 8 1.4 830 826 28 grading medium dense; cobbles grade out SPT 9 8 10 10 20 1.3 828 30

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CONFIDENTIAL BUSINESS INFORMATION BORING NO. BV-7 BLACK & VEATCH SHEET 2 OF 3 PROJECT CLIENT PROJECT NO. Interstate Power & Light Sutherland Station 145491 PROJECT LOCATION COORDINATES **GROUND ELEVATION (DATUM)** TOTAL DEPTH Marshalltown, lowa N 3479095.01 E 5097105.0° 855.9 ft (MSL) 80.5 (feet) SURFACE CONDITIONS COORDINATE SYSTEM DATE START DATE FINISHED State Plane 04/11/07 Agricultural field off access road 04/12/07 LOGGED BY SOIL SAMPLING CHECKED BY APPROVED BY VE 101 E. Meyer 3RD 8 INCHES SAMPLE R. S. Edwards V. Bhadriraju SAMPLE NUMBER SAMPLE N VALUE ELEVATION (FEET) . SAMPLE TYPE ဗ္ဂ DEPTH (FEET) ROCK CORING CLASSIFICATION OF MATERIALS REMARK\$ RON RECOVERY RECOVERY PERCENT RECOVERY GRAPHIC RUN NUMB! 8 824 32 Clayey SILT; dark gray; stiff; moisl; low plasticity 822 34 PP = 1.0 tsf SPT 10 4 9 2.0 4 5 38 820 818 38 Gravelly SAND; gray; medium dense; wet; medium to coarse grained: poorly graded; angular SPT 17 4 7 0 11 11 816 40 - 814 42 grading dense SPT 12 37 31 16 47 1.8 810 46 Clayey SILT; dark gray; very stiff; moist; low plasticity; w/trace angular sand; (Glacial Till) 808 48 PP = 4.5 tsf SPT 12 13 13 25 1.7 808 50 864 52 802 64 PP = 4.5 tsf grading hard SPT 14 16 17 33 14 BDO 798 68 PP = 2.5 tsfgrading very stiff SPT 15 13 13 27 1.0 60 Below 60' continued w/ 4-1/4" ID hollow stem auger. 62

EPA ARCHIVE DOCUMENT

PAL - Sutherland Stabon

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CONFIDENTIAL BUSINESS INFORMATION BORING NO. BV-7 **BLACK & VEATCH** SHEET 3 OF 3 CLIENT PROJECT PROJECT NO. Interstate Power & Light Sutherland Station 145491 PROJECT LOCATION COORDINATES **GROUND ELEVATION (DATUM)** TOTAL DEPTH E 5097105.01 N 3479095.01 Marshalltown, lowa 855.9 ft (MSL) 80.5 (feet) SURFACE CONDITIONS COORDINATE SYSTEM DATE START DATE FINISHED Agricultural field off access road State Plane 04/11/07 04/12/07 LOGGED BY SOIL SAMPLING CHECKED BY APPROVED BY 413 Je 800 N VALUE SAMPLE RECOVERY SAMPLE NUMBER SET 6 INCHES 2ND 6 INCHES 3RD 6 INCHES <u>R. S</u>. Edwards V. Bhadriraju E. Meyer SAMPLE ELEVATION (FEET) SAMPLE TYPE 9 (FEET) **ROCK CORING** CLASSIFICATION OF MATERIALS REMARKS RECOVERY RQD RECOVERY GRAPHIC RUN PERCENT RECOVERY DEPTH \$ õ 792 PP = 3.75 tsfSPT 16 ₽ 27 1.2 13 14 790 66 7B8 68 PP = 4.0 tsfSPT 17 8 12 13 25 1.2 788 70 784 72 782 74 PP = 3.0 (sf ŞPT 18 13 12 25 2.0 780 76 778 78 PP = 3.0 tsf \$PT 19 9 11 12 23 2.0 60 776 Bottom of boring @ 80.5'. Water 774 level not 82 recorded. Boring backfilled w/ cement bentonite -772 84 grout on 04/12/07 770 86 768 88 766 80 764 92

Attachment F

Deep Soil Borings
Sutherland Generating Station

Source:

Subsurface Exploration, Sutherland Air Heater Building TEAM Services, December 3, 2007

	LOG OF BORING NO. 1 Page 1 of 2											
OWN	ER	ARCHITECT/ENGINEER										
SITE		PRI	OJE	CT.								
١	Marshalltown, Iowa	+					eriano (PLES		Heate	r Bul	ilding TESTS	
8			Ì	أن		<u> </u>	APL <u>E:</u>	<u> </u>		T_		
l ži l		_		္ကမ		1		<u></u>	,.;	<u> </u>	E -	
₹	DESCRIPTION	ΙÉ		SYMBO	~		*	7.	₩.	VITISNEIC	GELL	
GRAPHIC LOG		=		80	B	.,,	3	z _s	1.5	Ē	SZ.	
8	Approx. Surface Elev.: 859.3 ft.	V (ii) I (fil.)	:	OSCS	NUMBER	HIAL AS	RECOVERY	SPT - N BLOWS / FT.	% WOISTURE. %	ĕĕ		
XXX	Fill SAND, with gravel and coal	+ =	. ,	SP	<u>z</u>	AS	≃	∞≃	84	25	1⊃%≅	
₩	2.0 debris, very dark gray 857	2	Ť			HS		1				
	3.0 Eine SAND 856		긬									
	Lean CLAY, trace sand and ferrous		‡	CL	2	SS	12"	3	28.2	 	1500*	
	s <u>taining,</u> dark grayish brown and yellowish brown, medium stiff	5	: -]	\dashv		HS		-	-	-		
	yenowian orowing mediant strif		╡									
	8.0	3	\exists									
	Silty fine to medium SAND, yellowish brown, very loose		‡	SP	3	SS	10"]	17.2		 	
	olowii, very ibose	10	⁺₹	\dashv		H\$		1		 -	 -	
	12.0 847.	3	7									
	Silty fine to coarse SAND, trace gravel.		∃									
	dark grayish brown, very loose		⇉	SP	4	SS	1"	1	13.2	 	1	
		15	1	-		HS	_	<u> </u>	-			
			\exists									
			=					ļ				
				SP	5	SS	1"	1		Ι .	1	
		20	+		_	HS	<u> </u>	<u> </u>	_		1	
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		25	寸		_	H\$		ì	_			
	27.0	3.	\exists						i			
	Fine to coarse SAND, trace gravel and silt, light brownish gray, medium		\exists									
	dense		_	SP	7	SS	14"	12	11.2			
		30	'寸			HS					 	
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- :-		,.	_	SP	8	SS	11"	16	13.5			
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	TRATIFICATION LINES REPRESENT THE APPROXIMATE BOUNDARY BEN SOIL AND ROCK TYPES: IN-SITU, THE TRANSITION MAY BE GR							Çal	ibraced (Hand Pa	mettoweter.	
	WATER LEVEL OBSERVATIONS		_			E	OREN	G STAR	RTED		11-1	3-07
WI,	TEAM SO	. <u> </u>		_	1-	BORING COMPLETED 11.13.07						
WL	TEAM Se	rvi(:e	s,	ine	C. _F	UG	Rig	112	F	OREMAN	MG
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	LOG OF BORING NO. 1 Page 2 of 2												
OWN	ær		ARCH	TEC	T/ENC	GINE	ER						
SITE			PROJE	CT				1 434.1	Yanta	. D.	ildina.		
- -	Marshalltown, Iowa						herland Air Heater Building MPLES TESTS						
GRAPHIC LOG	DESCRIPTION		DEPTH (A.)	USCS SYMBOL	NUMBER	Z TYPE	RECOVERY	SPT - N BLOWS / FT,	MOISTURE, %	DRY DENSITY PCF	1 1		
	Fine to coarse SAND, trace grave silt, light brownish gray, medicate dense	um	[]			HS							
	Silty fine to coarse SAND, trace g		=	SP	<u></u>	SS	17"	14	15.0		+		
	and ferrous staining, olive gray medium dense	у.	40 =			H\$,						
			=										
			45	ŠP	10	SS	18"	19	14.1				
///	46.0 Sandy lean CLAY, trace gravel, v	813.3	Ξ			HS							
	48,0 dark gray, very stiff	811.3	_	ÇL	11	SS	18"	19	10.7		7500*		
	Bottom of Boring												
	STRATIFICATION LINES REPRESENT THE APPROXI VEEN SOIL AND ROCK TYPES: IN-SITU, THE TRANS									Hand P	coccometer*		
	WATER LEVEL OBSERVATIONS WDIE					BORING STARTED 11-13-0° BORING COMPLETED 11-13-0°							
	TEAM Se			.	Ind	Ç.[=	ORIN	_			11-1		
WL WI		·	¥1003, 111			⊢	RIG Rig 112				FOREMAN MG		

	LO	G OF	ВО	RING	3 N	Ο.	2					Pa	gelof3
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ŞITE		-		PROJE	ĊŤ								
Ь,	Marshalltown, Iowa				 -				i Air I	Heate	r Bui		
ပ္က				,	انے ا		SAŅ	/ የየር.ES	<u> </u>	_		TESTS	
GRAPHIC LOG	DESCRIPTION			(U)	SYMBOL	<u>≅</u>		/ERY	SPT - N BLOWS / FT.	URE: %	DRY DENSITY PCF	STINED STINED	
GRAI	Approx. Surface Elev.: 859.7 ft.			(ייי) אגדיניוכ	OSCS 8	NUMBER	TYPE	RECOVERY	LOW LOW	MOISTURE.	CE; CE;	SECOND SECOND	
∞	Fill Lean CLAY, trace sand, grave	l.			CL		AS	≃	or m	19.1	<u> </u>	1-300	
₩	2.0 and organic matter, very dark brown		857.7	=			HS		-		_	\dagger	
	Lean CLAY, trace sand and ferrous			=			i	1				i	
	staining, dark gray, stiff			_	CL	2	SS	12"	5	22.4		2500*	
				5-			HS	-		<u> </u>	<u> </u>	+	1
				-							1		
	8.0		8517	=								!	ľ
	Silry fine to medium SAND, yellowis brown, loose	ரு 🌣			SP	3	SS	16"	5	17.7		 	
	OCOMPA TOOSE			10-		_	HS	 -	 			 	
	12.0		847.7	=		ı						[]	
	Silty fine to coarse SAND, trace grav light yellowish brown, loose	<u>⁄el,</u>		-		!]]	
	ngat yenowish brown, loose				SP	4	55	13"	4	14.5			
				15			HS	<u> </u>	 	_		† †	1
	17,0		842.7										
	Silty fine to coarse SAND, trace grav	<u>/el</u>		_					 			1	
	and ferrous staining. light olive brown, medium dense				SP	5	SS	12"	13	6,4			.
				20 =			HS					† †	
				Ξ								1	
	color change to gray @ 22'			Ξ									
					SP	6	SS	14"	10	12.6			
				25-			HS		<u> </u>				
				=									
1.1	becomes loose @ 28'			Ξ				<u> </u>		 			
	344,114,194,194,194			30-	SP	7	SS	10"	7	11.8	L _		'
				30-			HS						
	color change to armith braves			=	1		ì]	İ			
	 color change to grayish brown, becomes medium dense @ 32' 			Ξ					20	1,0.	_		
12.22				35	SP	8	SS	8"	20	10.1	<u> </u>		
Щ.	<u> </u>			33-									
THE S	TRATIFICATION LINES REPRESENT THE APPROXIMA (EEN SOIL AND ROCK TYPES IN-SITU, THE TRANSITI	TE BOUN ON MAY	DARY I. BE GRAI	NES DUAL					Ċa	libraled 1	land Pa	coctromulut"	ı
	WATER LEVEL OBSERVATIONS						Į	BORIN	G STAI	RTED		11-1	3-07
WL	<u> </u>		C	. 4:		1-	_	BORIN	G COM	PLETE	Ð	[1-]	3-07
WL	 	AM	Ser	VICE	:5,	IU(C. 7	RIĞ	Rig	112	F	OREMAN	MG
WL	_						Ţ	APPRO		REL	<u>)</u>	OB <i>≅</i>	1-2125

L		LOG OF BO	DRIN	Gi	NO.	. 2						age 2 of 3
ow	NER	<u>-</u>	ARC	HITE	CIÆ:	NGIN	EER	_	-	_		gc 2 01 5
Still			PRO.	εςτ							<u>-</u>	
	Marshalltown, Iow	<u></u>	+-		1	Suth	erlan MPLE	d Air	Heate	r Bui	lding TESTS	
GRAPHIC LOG	DESCRIPTION		DEPTIT (ft.)	USCS SYMBOL	NUMBER	-	VERY	SPT - N BLOWS / FT.	MOISTURE, %	DRY DENSITY PCF	STRENGTH PSP	
	Silty fine to coarse SAND, tra and ferrous staining, grayi medium dense	sh brown.	40-	42	9			15	10.7			
	43.0 Sandy lean CLAY, trace grav	81 <u>6.7</u> el. very		CL	10	HS	16"	<u> </u>	j			
	dark gray, very stiff		45		10	HS		13	12.4		_]
			50-	CL	11	SS HS	8"	20	12.7			
			55	CL	12	SS	18"	20	10.9	_		
			60 111	CL	13	SS HS	18"	16	11.8	-		
			65	CL		SS HS	18"	19	12.5	-		
THE ST	RATIFICATION LINES REPRESENT THE APPR	OXIMATE BOUNDARY LI	70	CL	15	SS	18"	ŽI Cali	12.4	and Penel	zometer*	
DEIWE	EN SOIL AND ROCK TYPES IN-SITU, THE TR WATER LEVEL OBSERVATIONS	ANSITION MAY BE GRAD	LAL		_	R/	ORING	STAR	_			
WL [\$\bar{2}\$		 		_	.	1			LETED		11-1	
WL WL		TEAM Sen	/ICE	s,	INC	RJ		Rig			EMAN	MG 1-2125

	LOG OF BORING NO. 2 Page 3 of 3											
OW.	IER		ARCH	TIEC	TÆNG	BENE	ER				_ _	<u>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</u>
SITE			PROJE	CT								
	Marshalltown, Iowa						erland <u>(PLES</u>		leate:	r Bu	ilding TESTS	
GRAPHIC LOG	DESCRIPTION	!	DEPTH (ft.)	USCS SYMBOL	NUMBER	TYPE	RECOVERY	SPT-N GLOWS/FT.	MOISTURE, %	DRY DENSITY	\neg	
						HS						1
			75	СĽ	16	SS HS	1	21	12.3			
	becomes hard @ 77°		=		'							l
	80,0	779.7	00	CL	17	SS	18"	29	12.3			
	Bettom of Boring		80-									
THE S RETW	TRATIFICATION LINES REPRÉSENT THE APPRO EEN SOIL AND ROCK TYPES: IN-SITU, THE TRA WATER LEVEL OBSERVATIONS	INSTITION MAY BE GRA	DUAL			- Li	BOREN			nano P	'enessemeter* 11-1	3-07
WL	- 071-	- 			la.		-			Ď		3-07
WL		TEAM Ser	AICE	. S,	11.10	-		Rig	112	_+	OREMAN	MG

	LOG OF BORING NO. 3										
OW?	VER	ARCH	ITEC	T/ENO	ane	ER					-
SITE	Marshalltown, Iowa	PROJE	ĊT	S1	nthe	erland	l Air l	Heater	r Bui!	ding	
\vdash			\Box			1PLES				TESTS	
GRAPHICLOG	DESCRIPTION	DEPTH (ft.)	USCS SYMBOL			RECOVERY	SPT - N BLOWS / IT.	MOISTURE, %	DRY DENSITY PCF	ONFINED	
GR,	Approx. Surface Elev.: 859.9 ft.	DEPT	nsc	NUMBER	TYPE	KEC	SPT.	MOÏ	PCF	UNC STRI PSF	
X	Fill - Lean CLAY, with sand, trace gravel, organic matter, and coal 3.0 debris, very dark brown Lean CLAY, trace sand and ferrous	-	CL		AS HS			5.6			
	staining, dark gray and olive brown, medium stiff	5-	CL	2	\$\$	13"	6	24.4		1500*	
	medium sum				HS						
	8.5 851.4 851.4										
	yellowish brown, very loose ₹	10-	SP		SS HS	10"	3	18.1			
	Silty fine to coarse SAND, trace gravel,				,,,		!				
	light yellowish brown, medium dense	15	SP	4	SS	11"	11	16.4			
					HS				_	_	
			SD	- 5	SS	9"	16	18.2		_	
		20 =	Sr.		HS		10	18.2			
	— color change to gray @ 23'							[
	55161 SILLIGS 15 E 57 (S) 25	25	SP	1	SS	8"	19	13.7			
					HS						
	color change to grayish brown @ 28'	. <u>-</u>	SP	7	SS	12"	16	9.9	_	_	
		30-			HS						
	becomes dense @ 33"										
		35-	SP	8	SS	10"	35	16.0			
THE S BETW	TRATIFICATION LINES REPRESENT THE APPROXIMATE BOUNDARY LI FEEN SOIL AND ROCK TYPES. IN-SITU, THE TRANSITION MAY BE GRAI	NES DUAL					Cal	ibrated H	and Pon	ctromace*	
	WATER LEVEL OBSERVATIONS				В	ORING	STAR	TED	_	11-1	3-07
\vdash	TEAM Serv	vice	S.	Inc	· L			PLETEI			3-07
WL WL		• •	Ξ,		<u> </u>	IG PPRO		RED	_	REMAN B#	DC 1-2125
	<u>, </u>				J''			IN F. LV	1,0		1-4143

ſ		F BO								ge 2 of 2					
OWY	VER				ARCH	TTEC	T/EN(GINE:	ER						
SITE				_	PROJE	CT.		ueba	uland	1 4 5 4 1	J. a. + a.	- D:	lding		
	(VIA ESTIA	iltown, lowa							PLES		Air Heater Building TESTS				
GRAPHIC LOG	DE	ESCRIPTION			DEPTH (ft.)	USCS SYMBOL	NUMBER	TYPE		SPT - N BLOWS / FT.	MOISTURE, %	DRY DENSITY PCF	UNCONFINED STRENGTH PSF		
	Silty fine to coar grayish brow		gravel.		=		. <u>-</u>	HS							
	J -				=										
	40,0			819.9	40-	SP	9	SS	91.	37	15.6				
7.7.7	40.5 Sandy lean CLA dark gray, ve	Y, trace gravel.	very	819.4	-								İ		
	· · · · · · · · · · · · · · · · · · ·	tom of Boring													
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THE S	STRATIFICATION LINES REPR	EKENT THE ADDROVE	YTMLATTE DOLLA	MDARY !	NES.		<u> </u>			Cal	ibrawd 1	 Hand Pe	petrometer*		
BETV	VEEN SOIL AND ROCK TYPES	IN-SITU, THE TRA	INSTITION MAY	BE GRAI	DUAL.			T.	MODE !			hand Le			
WL	WATER LEVEL OBSERV				_		_	Ţ		G STAR G COM		D		3-07 3-07	
WL	* 10' - +		TEAM	Ser	vice	s,	Inc	A L	RIG		rv.		DREMAN	DC	
WL	. ——							7	APPRO		REI) 10)B#	1-2125	

Attachment G

Well Record Well Number 6A, Permit No. 3090

Source:
Iowa Department of Natural Resources, Geological Survey Bureau

A Department of Natural Resources Geological Survey Bureau 209 Transcridge Hall lows City, Ia. S2242-1319 PH (319) 335-1575	WELL RECORD Permit No. 3090
Che 14 am at	
Property Owner 155 CONFIDENTIAL BUS	NESS INFORMATION
ACCIOSS E. MAIN ST ROAD; MARSHALL	DUN CO inch from a n in 63
Tenant	5Am + 63 + 3=2
Wed Depth 252 n Date Completed 5 /18 94	
Location County MARSHALL	Record all depen measurements from ground level (GL). Use (+) for above GL measurements, Casing Drive shoe (get/no.) Pitters adaptor (yet /no.)
mi. * undmi. * of Intersection ofend	Size (DAOO) , Type / Wt , Depth top , Caret better , Amount Carett
NW 1/4 of the SE 1/4 of the M 1/4 of Sec 32 TWP SAN ANG 17	54"10 5TH 1 62 63
	" 30" ID SEE /19 + 2 152 154
Show exact location of well in section grid with a dot (◆).	167 172 5
N Sharth map of well incarpan on property	182 240 58
-	Perforated or slotted casing? ***** (re)
W	Parlorated/slotted from h to h
FT	Perforated / slotted fromth toth
	Casing grouted? (yes/see)
S 200 %	Type Depth Top , Depth Bottom , Amount
Formation log	CEMENT 0 63 11 YOU OUT
From To Color Hardness Formation description	CEMENT 0 20 17 YD3
0 8 BLACK FILL MATTL	Well screen? (yes/ear)
8 11 BLACK TOP SOIL	Diameter Stot size Depth Top Depth Bottom Length Material
11 18 GRAY CLAY	30 1015 17Z 18Z 10 SST
18 22 GRAY SAND/GRAVE	250 10 155
77 W DA	Seals / Parkers / June / Seals / Parkers / June / Seals / Parkers / June / Seals / Parkers / June / Seals / Parkers / June / Seals / Parkers / June / Seals / Parkers / June / Seals / Parkers / June / Seals / Parkers / June / Seals / Parkers / June / Seals / Parkers / June / Seals / Parkers / June / Seals / Parkers / June / Seals / Parkers / June / Seals / Parkers / June / Seals / Parkers / June / Seals / Seals / Parkers / June / Seals
44 46 GRAY SANDY CLAY	Gravel packed (yes/ma) from 1'20 e p 252
Ah BR Roand Sail Fair F	NES type NORTH. 3 amount 106 TOAS
58 127 GRAY CLAY W/COBBLE	
127 132 ERMY SANDY CLAY	EXELOPED SURRED BAILED
132 AO GRAY SAND, GRAVEL	- PUMPED 9 SANCE
190 152 GRAY CLAY WITH SANT	Pump Installed? (yes rest) Date 06 101 , 94
152 168 GRAY SAND GRAVEL	Installer's name PAUL RENTS CHUER
168 173 GRAY CLAY, COPPLES	Type of pump VERTICAL TURB, Depth to Intake 150 A
IS 100 GRAY SAND	Puro dameter (" P.Kull - 1000
185 192 GRAY FINE SAND	Maria de la companya della companya
MY ZAI GRAY SANDY CLAY	Water Information Aquiler: Asand/gravel □ limestone □ sandstone Hain water-supply zone from 20 h to 252 h
AL 252 GRAY SAND GRAVE	Fredwarter land tower 27
COZ GIRAY LIMESTONE	Business 773 9
	All yield of 1315GPM; Korišce (I volumetric (Lestimate Date 5-18-94)
sales additional sheets as needed	
Remarks (Indusing depth of lost drilling fluids, materials, or soots)	Water quality test? (yes/sec) Date tested 5 /18 /94
	Tested by LINV. OF TOWA LAB
Well use	Test results.
☐ Domestic ☐ Municipal ★ Mudustrial	Contractor LAYNE - WESTERN
☐ Uvestock ☐ Public Supply ☐ Monitoring ☐ Test, Well ☐ Irrigation ☐ Other	AMORES 25450 HWY 275; VALLEY NE 6800A
[\$40[44]	Driller D. DEAVER Certification no. 40259
Me copy - Jawa DNR, Geological Survey Bureau blue copy - Well C	

US EPA ARCHIVE DOCUMENT

Omaha, Nebraska

Page 2

CONFIDENTIAL BUSINESS INFORMATION

Well No...

6

Log of well from ground level:

EPA ARCHIVE DOCUMENT

Feet Feet	FILL MATERIAL Formation
	A CONTRACTOR OF THE CONTRACTOR
8 to11	TOP SOIL
11 to18	GRAY CLAY
to22	
22 to44	
46 to58	
58 to127	
127 to	SANDY GRAY CLAY - SMALL GRAVEL
132 to 140	SAND WITH SHALL GRAVEL
140 to 152	SANDY GRAY CLAY
152 to 168	
168 173	
173 to 185	GRAY SAND
185 to 192	
192 to 241	SANDY GRAY CLAY WITH CORPURE
252.5	SAND AND GRAVEL LIMESTONE, TOTAL DEPTH
_	250¹ 0+pth
	130' Gravel Pack
	Casing Extensio
6	**************************************
1 <u>52'-167'</u> , 172'-1	82' -240'-250'
98'	SCREEN & CASING Casing
0 . 0 0 . 60 . 0 0 3 . 60	000 000
104.9.00 000 00	

NOTE: 54" OUTER CASING GROWED 0'-63'
20' BENT. CHIP ABOVE GRAVEL PACK
80' SAND, TOP ZO' CEMENT GROWTED

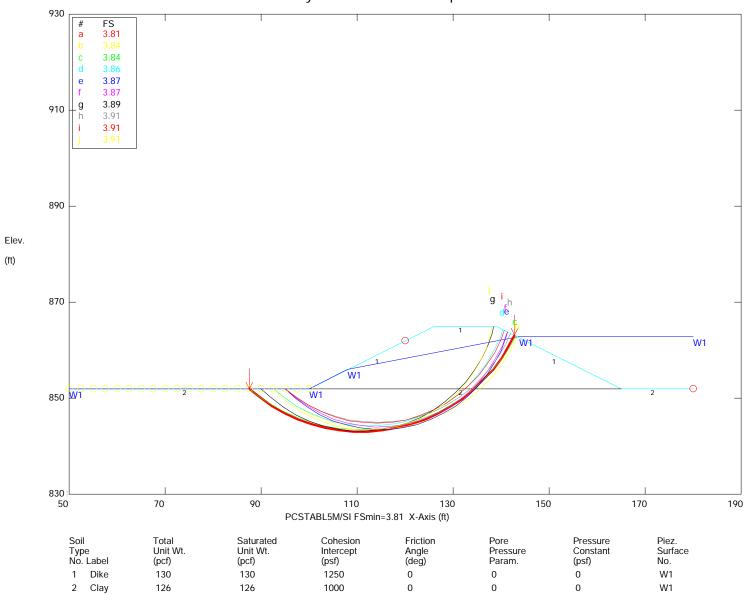
Malural Ground Level

Attachment H

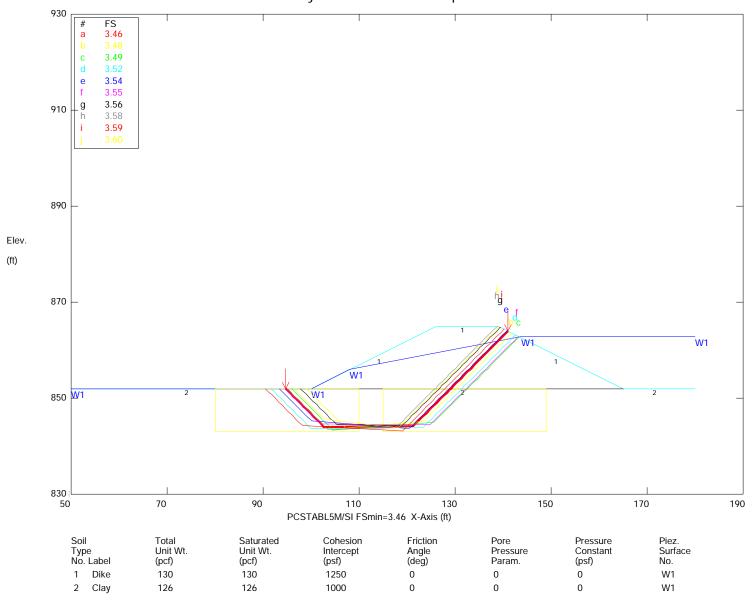
Slope Stability Analyses Results
Ten Most Critical Surfaces Per Analysis
Sutherland Generating Station

Source: Program pcSTABLE5m/si output by Aether dbs, June, 2011

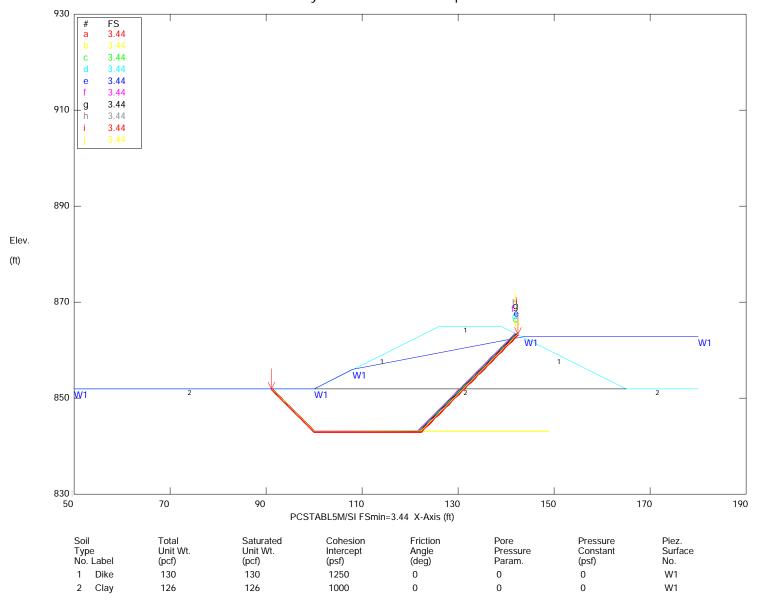
Alliant Energy - Marshalltown, Iowa Static Case Ten Most Critical. C:MARSH01.PLT By: TCW 06-15-11 4:09pm



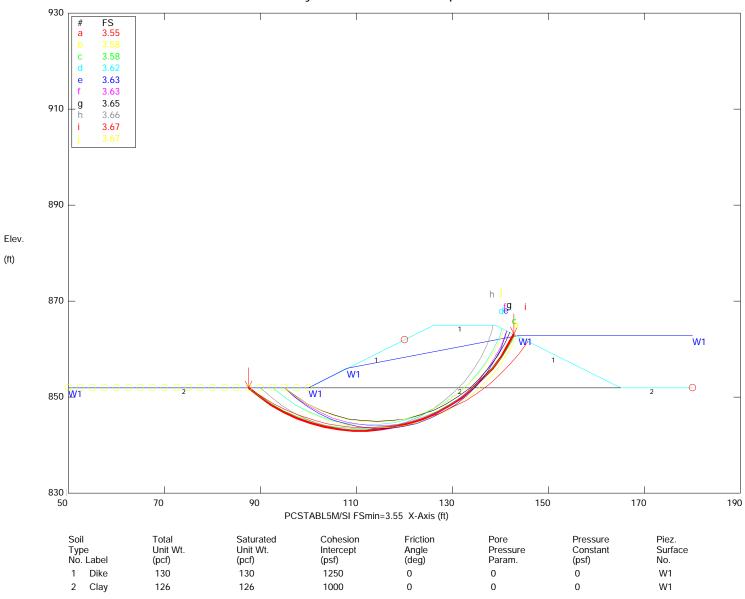
Alliant Energy - Marshalltown, Iowa Static Case Ten Most Critical. C:MARSH02.PLT By: TCW 06-15-11 4:18pm



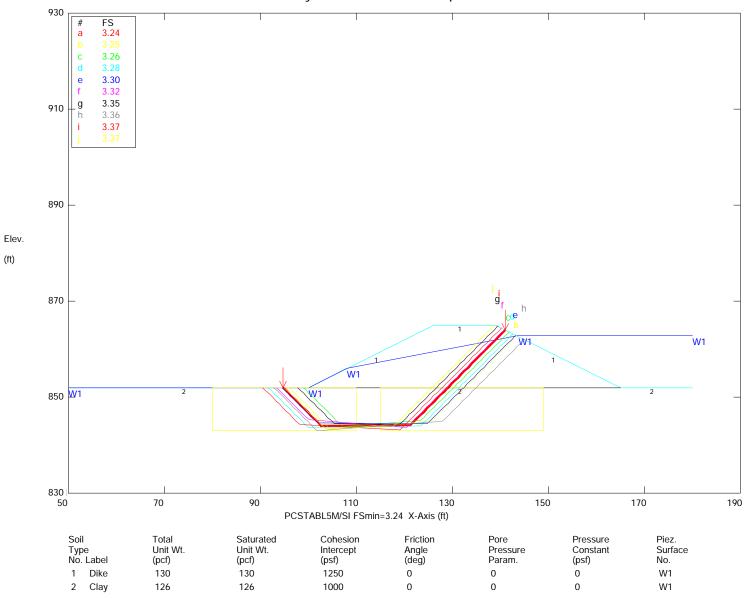
Alliant Energy - Marshalltown, Iowa Static Case Ten Most Critical. C:MARSH03.PLT By: TCW 06-15-11 4:20pm



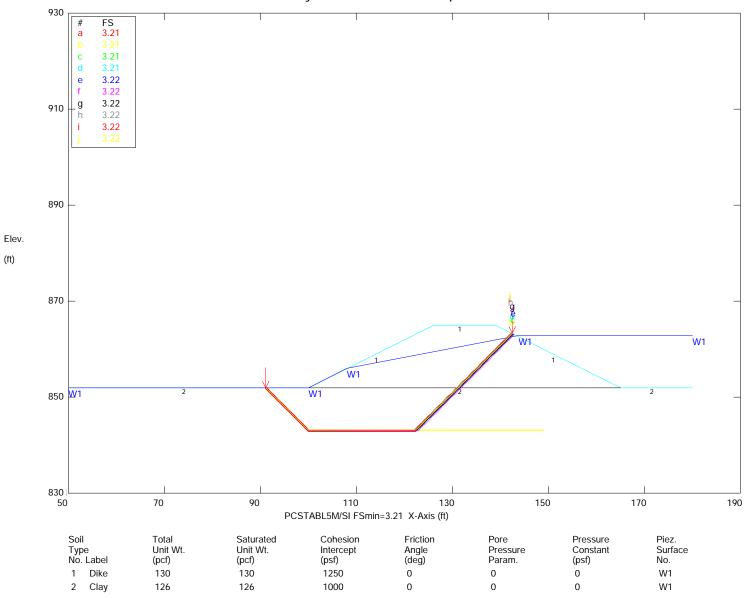
Alliant Energy - Marshalltown, Iowa Earthquake Case (0.019 & -0.013) Ten Most Critical. C:MARSH11.PLT By: TCW 06-15-11 4:27pm



Alliant Energy - Marshalltown, Iowa Earthquake Case (0.019 & -0.013) Ten Most Critical. C:MARSH12.PLT By: TCW 06-15-11 4:28pm



Alliant Energy - Marshalltown, Iowa Earthquake Case (0.019 & -0.013) Ten Most Critical. C:MARSH13.PLT By: TCW 06-15-11 4:29pm



APPENDIX E AETHER RESPONSE TO DRAFT REPORT (JULY 2012)



elemental design build solutions

July 18, 2012

154.017.002.002

Mr. William Skalitzky Alliant Energy Corporate Services 4902 N. Biltmore Lane Madison, WI 53718

Response
USEPA Draft Report
Safety of Coal Combustion Waste Ponds
Sutherland Generating Station
Marshalltown, Iowa

Dear Mr. Skalitzky

Aether DBS provides a response to the Draft Report issued by United States Environmental Protection Agency (USEPA) commenting on the structural safety analysis of the coal combustion waste pond on the Sutherland Generating Station property. The draft report was prepared by AMEC Earth & Environmental, Inc. (AMEC) and is dated July 2011. Since the time of the AMEC inspection, the Sutherland Generating Station transitioned to natural gas firing the boiler, however fossil fuel (coal) combustion equipment remains installed and could be used in the future. Since coal combustion waste is not presently discharged to the ponds the normal analysis conditions are different than 2011.

Aether DBS concurs with the AMEC finding that the Main Ash Pond on the Sutherland Generating Station is **low hazard potential**. The AMEC report further rates the North and South Primary Settling Ponds as separate structures with a rating of Less than Low Hazard Potential. Aether does not consider these internal structures separate of the single ash pond and the less than low hazard potential is not a category supported by the Interagency Committee on Dam Safety (FEMA).

In the conclusion of the draft report AMEC provides a United States Army Corps of Engineers (USACE) condition rating of **POOR** to the pond. In justification of the **POOR** rating AMEC cites the following:

 Analysis of the embankment stability should be based on long term conditions (effective stress) not short term conditions (total stress).

- Pocket penetrometer tests alone should not be used to determine the strength parameters for the clay embankment.
- A geotechnical engineer should evaluate the use of conservative values for strength properties of the embankment and/or determine if further strength data is needed.
- The critical cross-sections of the embankment should be confirmed by survey measurements separate of the topographic mapping from 2006.
- The east dike where water is present at the toe of the embankment should be evaluated for the impact of high phreatic surface and soft foundation conditions.
- The impacts of rapid drawdown on the upstream embankment should be analyzed.
- Analysis should consider lower strength values to account for inconsistencies within in the fill or the foundation soil.
- The pond freeboard should be increased to keep the internal pond divisions operating as separate ponds at the extreme 100-year return flow event.

In the conclusion of the AMEC report, there is no mention that the total stress stability analysis of the pond embankment by Aether indicated an Earthquake and Long-Term factor of safety that is more than twice the minimums cited in Table 5 of the AMEC report.

In Appendix A of the AMEC report, the Main Ash Pond configuration is selected as DIKED. Aether believes that the correct selection is COMBINED INCISED/DIKED.

Response and Additional Information

The outer embankments of the coal combustion waste impoundment were constructed in 1955 along with the Sutherland Generating Station Units 1 and 2. The embankments were constructed by excavating Zook clay in the impoundment area and using the Zook clay to build embankments with a top elevation equal to the established generating station grade (elevation 865). This is evident from the findings that the hard pond bottom is lower than the surrounding ground surface and that the embankments are constructed of black clay (Zook clay)².

The Sutherland Station is located in the alluvial outwash formations of the Iowa River. The TEAM Services deep borings west of the ponds and the Black & Veatch borings south of the ponds indicate that sand is present below elevation 850. The TEAM Services and Black & Veatch boring logs and locations were provided in the Aether stability analysis report³. The top elevation of the sand in each boring is tabularized below. (Boring BV-7 is approximately 900 feet down the valley.) The density of the sand immediately below the clay is loose to medium dense.

¹ Sheet 2, Final Design of Pond Reconfiguration, Hard Hat Services, Inc., April 19, 2006 (referenced in Appendix C of AMEC report).

² Soil Survey of Marshall County, United States Department of Agriculture, Soil Conservation Service.

³ Aether, "Ash Pond Slope Stability and Hydraulic Analysis, June 2011.

Soil Boring	Boring Depth (Ft.)	Sand Depth (Ft.)	Surface Elevation (Ft.)	Sand Top Elevation (Ft.)
B-1	48	8.0	859.3	851
B-2	80	8.0	859.7	852
B-3	40.5	8.5	859.9	851
BV-6	80.5	7.0	856.6	850
BV-7	80.5	8.0	855.9	848

The general soil stratigraphy in Iowa is windblown loess on the surface with glacial till below the loess. In some locations the loess is eroded away and in river valleys the till is also totally or partially eroded and overlain by alluvial soils. The Marshall County Soil Survey² indicates that Zook clay is some of the finest textured soil derived from alluvial deposition and is found in the lower parts of bottom lands below alluvial benches that divide the bottomland of river valleys from the loess deposits. The USGS topographic quadrangle "Marshalltown Southeast" indicates that the natural ground surface adjacent to the impoundments is between elevations 855-860. The USGS elevation range is consistent with the June 2012 cross-section survey results by Aether.

Zook clay is black clay with an organic content of 5-7% due to its deposition in areas where the ground water elevation is coincident with the ground surface most of the year. The Marshall County soil survey indicates that the upper 18 inches is CL or CH and from 18 to 60 inches CH. The liquid limit and plastic index range for Zook Clay is:

Zook Clay	Liquid Limit	Plastic Index
0-18 inches	45-65	20-35
18-60 inches	60-85	35-55

Selected pages from the Marshall County Soil Survey are provided in Attachment A.

The generalized soil conditions at the embankments is compacted Zook Clay from the top elevation at 865 (feet) to elevation 857-855 (assuming some topsoil was stripped prior to compacting the embankment), undisturbed Zook Clay to elevation 850 and loose to medium dense alluvial sand below that elevation. The Zook Clay prior to construction of the embankments was approximately 8-feet thick and was exposed to desiccation and bottom drainage after deposition. In addition to the natural drainage and desiccation, the undisturbed Zook Clay below the embankments has been surcharge loaded by as much as 8-feet of compacted embankment for over 50 years further consolidating the clay under the embankment. The pocket penetrometer results from the Aether borings indicate that Zook Clay under the embankments is over consolidated. Immediately after construction of the embankments and prior to consolidation from the construction, the external embankments were able to withstand normal operational water pressures without distress.

To resolve issues raised by AMEC on the geometric cross-section of the embankments, Aether surveyed the slopes at four locations in June 2012 as identified on Figure 1. The

sections correspond to the areas of concern expressed by AMEC and to the original critical cross-section selected by Aether. The survey results are shown on Figure 2 and the field measurements indicate that the downstream (outer) slopes of the embankment range from 2.25:1 to 1.6:1. The results also show that the toe of the embankment is at elevation 857 or 858 and that the embankments are up to 8 feet high. The upstream / inside slopes are much more uneven due to the 2006 ash removal in the main pond and/or wind/wave erosion in the polishing pond.

Since water is not being used to sluice bottom ash from the boilers, the water elevation in the ponds has dropped dramatically, Photo 1. The ponds still receive storm water runoff, blow down water from the cooling water loop, sump water and air compressor cooling water. Without the sluicing water, the water elevation in the main ash pond is at the ground surface elevation outside the pond, Photo 1. Cattails growing at the outside base of the embankment indicate that the groundwater is at or near the ground surface.



Photo 1 - South western corner of the Main Ash Pond looking west. (Aether 6/19/2012)

Without the bottom ash sluicing water, there is no flow to the Polishing pond which shows a dry bottom, photo 2.



Photo 2 - Looking north along the eastern outer embankment. (Aether 6/19/2012)

The low water elevation indicates that exfiltration through the bottom of the Main Ash Pond into the underlying sand is sufficient to balance present operational flows such that the Main Ash Pond water level is close to the natural groundwater table elevation. Under the present conditions, Aether estimates that the 100-year, 24-hour SCS design storm runoff would fit in the Main Ash Pond and would not discharge into the Polishing Pond.

To address stability concerns raised by AMEC, Aether modeled cross-section 2 on Figure 1 using total stress soil strength for the embankment. Cross-section 2 has the greatest height of the three sections measured on the Main Pond. The slope stability soil profile includes loose sand below elevation 850, a consolidated and/or compacted Zook Clay embankment, consolidated clay under the embankment, and a weak normally consolidated Zook Clay at the toe of the embankment.

With the pond water elevation nearly the same as the outside groundwater elevation, the critical loading case is the sudden filling and emptying of the Main pond due to an extreme storm event. Since the pond would fill relatively quickly during a storm, a total stress analysis is appropriate. Conservatively, the Zook Clay embankment and subgrade is assigned the minimum cohesion value measured by pocket penetrometer testing during the 2006 investigation (1,000 PSF). The clay at the toe of the embankment and in the pond is assumed to remain normally consolidated with cohesion of 250 psf (soft clay). The sand is assigned a friction angle of 28° representing loose sand.

Program STABL5M (1996) from Purdue University⁴ was used to analyze hundreds of potential slip surfaces. The program calculates a factor of safety based on the ratio of the driving forces to the resisting forces along each potential slip surface. A calculated factor of safety greater than one indicates stability along the surface analyzed. The ten most

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⁴ STABL User Manual, By Ronald A. Siegel, Purdue University, June 4, 1975 and STABL5 ...The SPENCER Method of Slices: Final Report, By J.R.Carpenter, Purdue University, August 28, 1985

critical circular failure surfaces are shown in Attachment B. All ten surfaces extend into the sand layer because of the uplift water pressure in the sand. (Disproportional head loss or exfiltration through the pond's bottom was ignored.) The lowest calculated Factor of Safety is greater than 3.3. Because of the high factor of safety there is no need to obtain more accurate soil strength data.

To analyze for the impact of converting back to coal firing of the boiler and refilling the ash ponds with water, Aether analyzed the stability with the pond at previous water operating elevation. In this case the cross-section 4 on the polishing pond has the greatest overall embankment height and steepest outboard slope. Effective stress soil parameters were assigned to the compacted clay, consolidated clay under the embankment, and normally consolidated clay at the toe of the embankment. As discussed by the Bureau of Reclamation⁵, average compacted clay strength parameters for CH clay may be used for dams of Low Hazard potential without further testing. Based on the Bureau of Reclamation compilation, a friction angle of 19° and cohesion of 240 psf was assigned to the embankment and the consolidated clay under the embankment. For the normally consolidated clay at the toe of the embankment, the friction angle is chosen as 24° based on a plastic index of 55 and the relationship reported by Kenney in 1959⁶ between plastic index and friction angle for normally consolidated clay. The stiff clay in the embankment above the phreatic surface that would be established under effective stress conditions is conservatively ignored and the thin clay layer at the toe is assumed to be normally consolidated which is not likely for such a thin deposit subject to easy drainage and surface dessication.

The results of the stability analysis with the the ultra-conservative assumption of effective stress parameters using STABL5M is a safety factor of 1.6 with the pond at normal overflow operating elevations, Attachment B. The results indicate that there is no need to perform further laboratory analysis on the soils of this **Low Hazard** embankment.

A specific response to each of the issues raised by AMEC is:

- 1. <u>Effective versus Total Stress</u> -- The AMEC report makes reference to normally consolidated clay which means clay that has not been consolidated by previous loadings other than its self-weight (i.e., not preloaded by an ice sheet over the clay, eroded soil over the clay, or a lowered ground water elevation). There is no indication in the literature on the soil formation processes for Marshall County or in the conditions at the site that Zook Clay is normally consolidated. However, Aether made very conservative assumptions as recommended by the US Bureau of Reclamation for **Low Hazard** potential embankments and finds that the embankments are stable with an effective stress analysis.
- 2. <u>Pocket Penetrometer Testing Alone Unacceptable</u> -- The observation of the personnel taking the samples is also factored into the determination of the clay strength. Pocket penetrometer results alone are not the sole determinate.

⁵ United States Bureau of Reclamation, Design of Small Dams, pages 136-139, 1977.

⁶ Kenney, T. C., Discussion, Proc. ASCE, Vol 85, No. SM3, pp. 67-79

Experienced personnel are able to see the physical difference between stiff clay and soft clay. The lowest observed clay strength is used in the analysis even though it is obvious that the upper part of the embankment above the saturation point is much stiffer. The LOW HAZARD potential of the embankments and determinate strength does not warrant more extensive testing.

- 3. Qualified Geotechnical Engineer Needs to Review Strength Properties -- Both of the authors have Masters Degrees in Geotechnical Engineering with over 35 years of experience in the field of geotechnical engineering, Attachment C provides the resume's of each author.
- 4. <u>Critical Cross-Section Needs to be Measured</u> The results on Figure 2 show the measurements made at the two cross-sections noted by AMEC and two other locations selected by Aether. Due to the very short height of the embankments (eight feet versus thirteen feet), compared to the original analysis, the variations from 2 horizontal to 1 vertical on the outer slope are insignificant.
- 5. Water at Toe of East Dike The section was measure by survey and found to be no different than the other sections. Groundwater surface and ground surface are approximately the same as shown on Photo 1 where cattails are prevalent at the natural ground surface below the toe of the embankment.
- 6. Analysis with Lower Strength Values The cross-section was changed to include soft clay at the toe of the embankment and to show very loose sand under the Zook Clay. The changes result in total stress failure potential that is deeper than the previous analysis but approximately the same factor of safety. Results assuming a full pond and very conservative effective stress soil parameter show a failure surface that is through the embankment and into the normally consolidated clay assumed at the toe. Even when the stiff clay on top of the embankment is ignored, the safety factor still remains above 1.5.
- 7. <u>Increase Pond Freeboard</u> –The division embankment between the Main pond and the Polishing pond was designed to overtop in severe flow events. With the Sutherland facility no longer sluicing coal combustion waste the entire pond capacity is available as freeboard under gas-fired operations.

Summary

The available site information provides sound information on the characteristics of the small embankments that contain the coal combustion waste at Sutherland Generating Station. The information indicates that the embankments are constructed of the native clay that was present at the site and that the clay was excavated from the interior of the impoundment to create the embankments. Site information also shows that alluvial sand and gravel deposits exist below the clay.

Reasonable conservative soil strength assumptions demonstrate the factors of safety for an unusual loading event, a 100- year flood flow, is far greater than the required minimum. Very conservative assumptions of soil strength under full impoundment and effective stress analysis show an acceptable factor of safety.

The conversion of the Sutherland Generating Station to natural gas has changed the pond operations with no coal combustion waste being sent to the pond. As shown an extreme

flow event to the Main Pond will satisfy the acceptable margins of safety with soil strengths that are conservative for the conditions at the site. In the event the station returns to coal firing, the Long Term (effective stress) strength of the embankment is adequate for a LOW HAZARD embankment.

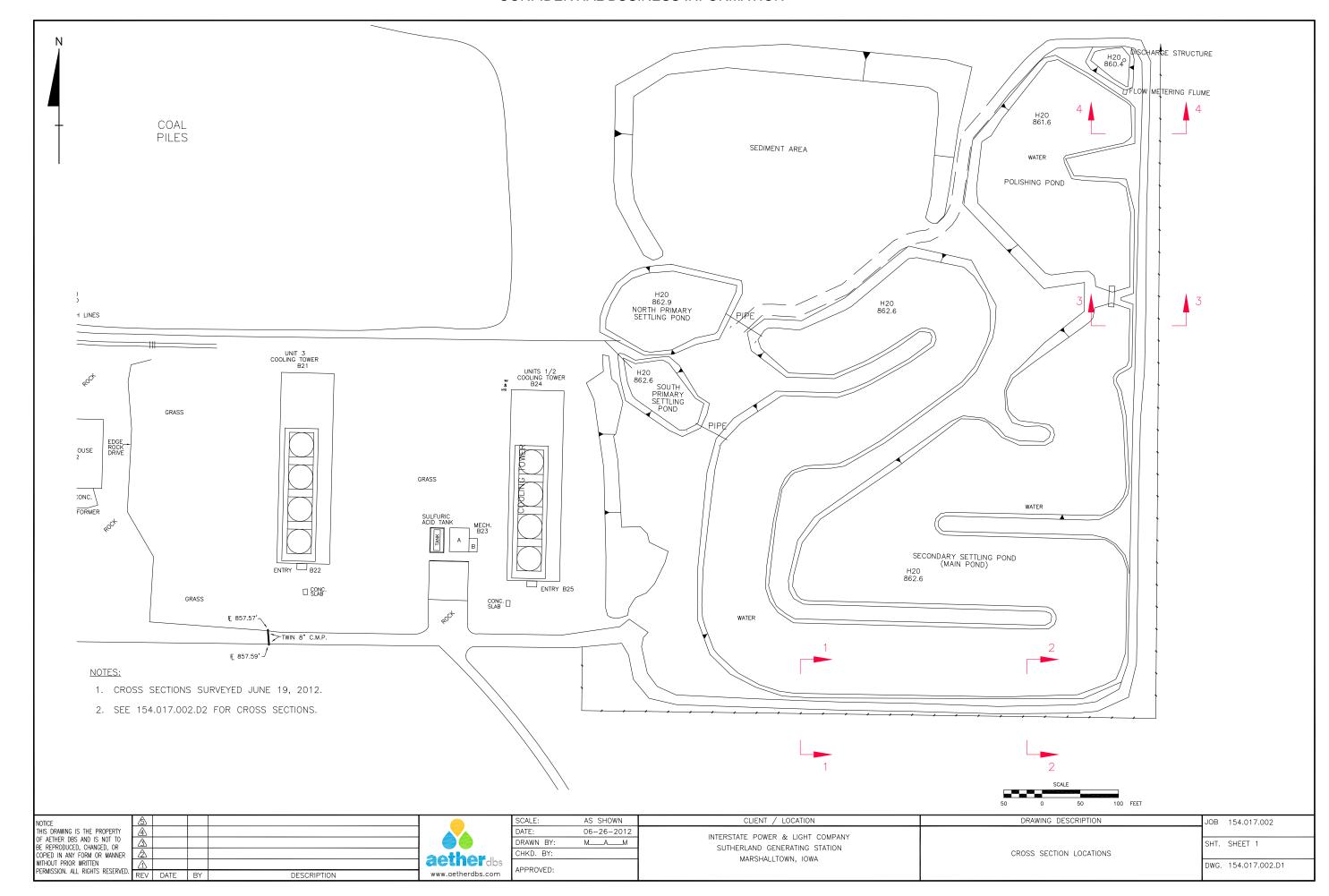
Aether DBS believes the condition assessment for the Sutherland Coal Combustion Waste Pond should be a **SATISFACTORY** rating.

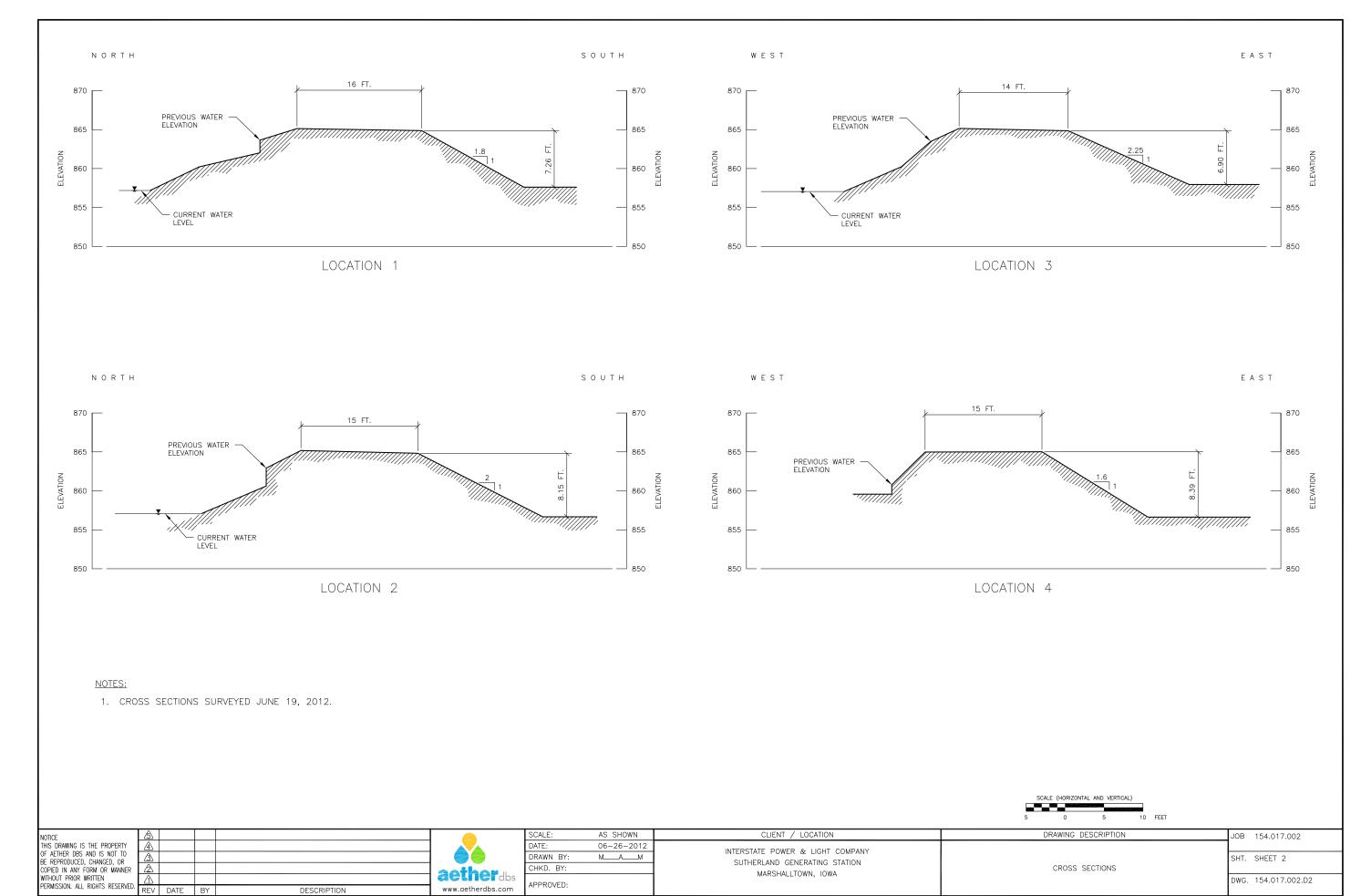
If you have any questions, please call or e-mail.

Very truly yours,

Timothy J. Harrington, P.E.

Thomas C. Wells, P.E.





Attachment A

Soil Survey of Marshall County, Iowa
United States Department of Agriculture &
Soil Conservation Service

Excerpted Pages

Soil Survey of

Marshall County, Iowa

United States Department of Agriculture, Soil Conservation Service in cooperation with the lowa Agriculture and Home Economics Experiment Station Cooperative Extension Service, Iowa State University and Department of Soil Conservation, State of Iowa



general soil map units

The general soil map at the back of this publication shows broad areas, called soil associations, that have a distinctive pattern of soils, relief, and drainage. Each soil association on the general soil map is a unique natural landscape. Typically, a soil association consists of one or more major soils and some minor soils. It is named for the major soils. The soils making up one association can occur in other associations but in a different pattern.

The general soil map can be used to compare the suitability of large areas for general land uses. Areas of suitable soils can be identified on the map. Likewise, areas where the soils are not suitable can be identified.

Because of its small scale, the map is not sultable for planning the management of a farm or field or for selecting a site for a road or building or other structure. The soils in any one association differ from place to place in slope, depth, drainage, and other characteristics that affect management.

Colo-Lawson-Zook association

Nearly level, poorly drained and somewhat poorly drained, silty soils formed in alluvium; on bottom lands and alluvial fans

This association consists of nearly lovel soils on flood plains and fans along major streams and in river valleys. These soils are subject to flooding. In places near the natural water course, the flood plains are severely dissected, and water stands in old channels.

This association makes up 10 percent of the county. It is about 29 percent Colo soils, 13 percent Lawson soils, 10 percent Zook soils, and 48 percent soils of minor extent (fig. 2).

Colo soils, on flood plains and allovial fans, are nearly tevel and are poorly drained. Typically, the surface fayor is black sity clay learn about 11 inches thick. The subsurface layer is black sitty clay learn about 26 inches thick. The next layer is very dark gray sitty clay learn about 14 inches thick. The substratum to a depth of about 60 inches is light brownish gray sitty clay learn.

Lawson soils, on first and second bottoms, are nearly level and are somewhat peorly drained. Typically, the surface layer is black silty clay loam about 6 inches thick. The subsurface layer is black and very dark brown silty clay loam in the upper part and very dark grayish brown silty clay loam in the lower part. The substratum to a depth of about 60 inches is dark grayish brown silty clay loam.

Zook soils, on low flood plains, are nearly level and are poorly drained. Typically, the surface layer is black sifty clay loam about 9 inches thick. The subsurface layer is black sifty clay loam and sifty clay about 31 inches thick. The subsuit to a depth of about 60 inches is very dark gray and grayish brown, triable sifty clay loam.

Soils of minor extent in this association are the Ackmore, Hanlon, Lawlor, Novin, Nodaway, Saude, and Wiota soils. The poorly drained and somewhat poorly drained Ackmore soils and moderately well drained Nodaway and Hanlon soils are on broad flood plains and bettom lands near the natural stream channel. In addition, Ackmore and Nodaway soils are on alluvial fans near tributaries. The somewhat poorly drained Lawler soils and well drained Saude soils are on stream benches and outwash plains. The somewhat poorly drained Nevin soils are on high bottoms and low stream benches. The well drained and moderately well drained Wiota soils are on stream benches.

Most areas of this association are used for cultivated crops. Channeled and dissected areas of the flood plain are used for pasture and trees. The main onterprise is growing cash grain crops. The soils are well suited to cultivated crops if they are adequately drained and protected from flooding. They are poorty suited to building site development and senitary facilities.

Corn, soybeans, oats, hay, and pasture grow well on the soils of this association. The organic matter content and the available water capacity of these soils are high. The main concerns of management are improving drainage and protecting the soils from flooding. These soils can be drained by tile and surface drains if adequate outlets are available. Diversions, levees, and channel improvements help to provide flood protection and control runoff from adjacent areas.

2. Muscatine-Tama-Garwin association

Nearly level and gently sloping, somewhat poorly drained, well drained, and poorly drained, sitty soils formed in losss; on uplands

This association consists of wide areas of nearly level soils on divides and gently sloping soils on side slopes. The landscape is mostly gently undutating and undulating.

6 Sall survey

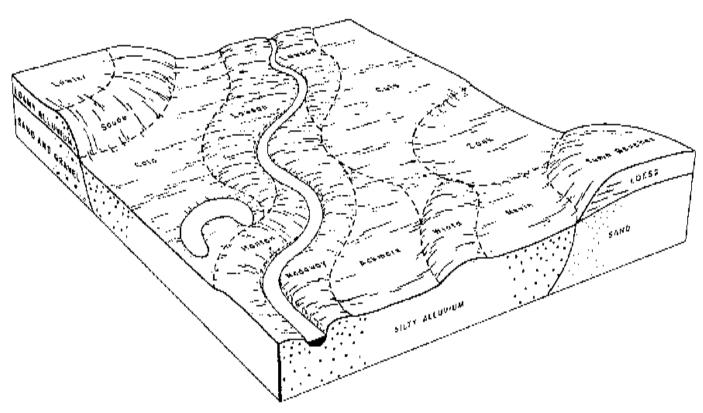


Figure 2. - Typical pattern of soils and parent material in the Colo-Lawson-Zook soil resociation

This association makes up about 21 percent of the county. It is about 43 percent Muscatine soils, 38 percent Tama soils, 13 percent Garwin soils, and 6 percent soils of minor extent.

Muscatine soils, on moderately wide divides, are very gently sloping and are somewhat poorly drained. Typically, the surface layer is black silty clay loam about 8 inches thick. The subsurface layer is black and very dark brown silty clay loam about 10 inches thick. The subsoil is silty clay loam about 27 inches thick. It is very dark grayish brown and dark grayish brown in the upper part and mottled grayish brown and light clive brown in the tower part. The substratum to a depth of about 60 inches is grayish brown, mottled silty clay loam.

Tama soils, on broad convex ridgetops and side slopes, are nearly level and gently sloping and are well drained. Typically, the surface tayer is very dark brown silty clay loam about 7 inches thick. The subsurface layer is very dark brown and very dark grayish brown silty clay loam about 9 inches thick. The subsoil is friable silty clay foam about 31 inches thick. It is brown in the upper part, yellowish brown in the middle part, and dark yellowish brown and yellowish brown in the lower part. The substratum to a dapth of about 60 inches is yellowish brown, mottled silty clay loam.

Garwin soils, on wide divides and concave heads of

drainageways, are nearly level and are poorly drained. Typically, the surface layer is black silty clay loam about 8 inches thick. The subsurface layer is black and very dark gray silty clay loam about 9 inches thick. The subsoil is triable silty clay loam about 26 inches thick. It is dark gray and gray in the upper part and mottled clive gray in the lower part. The substratum to a depth of about 60 inches is light clive gray, mottled silty clay loam.

The solls of minor extent in this association are the Colo, Ely, Harpster, and Sperry soils. The poorly drained Colo soils are in upland drainageways. The somewhat poorly drained Ely soils are on foot slopes. The poorly drained, calcareous Harpster soils are on wide divides and at the heads of drainageways. The very poorly drained Sperry soils are in slight depressions on wide divides.

Most areas of this association are used for row crops (fig. 3). The main enterprise is growing each grain crops, These soils are well suited to all cultivated crops commonly grown in the county.

Corn, soybeans, oats, and hay grow well on the soils of this association. The available water capacity is high to very high. The organic matter content of these soils is moderate to high. The main concerns of management are controlling erosion and improving drainage.

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phosphorus, and low in available potassium. This soil has good tilth.

Most areas of this soil are in cropland. This soil is well suited to cultivated crops, hay, and pasture if protected from run-on water and if the outlets are available. It is poorly suited to sanitary facilities and building site development.

This soil is well suited to corn and soybeans if drainage is adequate. Open drains and tile outlets are necessary to adequately drain this soil. This soil generally occurs as small areas within larger areas of better drained soils. Areas of this soil are subject to flooding because of runoff from adjoining soils. Return of all crop residue holps to maintain titth.

This Vesser soil is in capability subclass liw.

54—Zook silty clay toam, 0 to 2 percent slopes. This nearly level, poorly drained soil is on flood plains. Areas of this soil are subject to occasional flooding. Typical areas are broad and irregular in shape and rango from 5 to more than 100 acres.

Typically, the surface layer is black silty clay loam about 9 inches thick. The subsurface layer is black silty clay loam and silty clay about 31 inches thick. The subsoil is very dark gray and grayish brown, friable silty clay loam to a depth of about 60 inches. Some areas have about 12 inches of silt toam overwash.

Included with this soil in mapping are small depressional areas that are high in organic matter content. These areas contain marsh vegetation, Marsh areas pend water for long periods and are not cultivated. These areas make up 5 percent of this map unit.

Permeability of this Zook soil is slow, and surface runoff is slow to very slow. The available water capacity is high. This soil has a seasonal high water table. The content of organic matter in the surface layer is 5 to 7 percent. The surface layer is slightly acid or neutral, and the subsoil is medium acid to mildly alkaline, tow in available phosphorus, and very low in available potassium. This soil has poor tilth.

Most areas of this soil are in cropland. This soil is well suited to cultivated crops if adequately drained and if protected from flooding. It is poorly suited to sanitary facilities and building site development.

This soil is well suited to corn and soybeans it drainage is adequate. Areas can be drained by tile and surface drains if adequate outlets are available. Diversions, levees, and channel improvements are used to control flooding and runoff from adjacent areas. Artificial drainage improves the timeliness of field operations and helps to improve tilth.

This Zook soil is in capability subclass liw.

55—Nicollet loam, 1 to 3 percent slopes. This very gently sloping, somewhat poorly drained soil is on slightly convex or plane, sloping ground moralnes that have low rollef. In places, this soil is on too slopes or in the upper part of drainageways. Individual areas are irregular in shape and range from 5 to 40 acres.

Typically, the surface layer is black loarn about 8 Inches thick. The subsurface layer is foam about 12 inches thick. It is black in the upper part and very dark gray in the lower part. The subsoil is friable clay loam about 13 inches thick. It is dark grayish brown with dark yellowish brown mottles in the upper and middle parts and dark grayish brown and mottled in the lower part. The substratum to a depth of about 60 inches is grayish brown, mottled loam.

Included with this soil in mapping are a few small areas of Webster and Okoboji soils that are poorly drained or very poorly drained. These soils are on lower areas and have a heavier textured subsoil. The Okoboji soils pond water. These soils make up 5 to 10 percent of this map unit.

Permeability of this Nicollet soil is moderate, and surface runoff is slow. This soil has a seasonal high water table. The available water capacity is high. The surface layer is slightly acid or neutral, and the subsoil is slightly acid or medium acid. The content of organic matter is about 5 to 6 percent in the surface layer. The subsoil is very low in available phosphorus and very tow to low in available potassium. This soil has good titth.

Most areas of this soil are cultivated. This soil is well suited to cultivated crops, hey, and pasture, it is poorly suited to sanitary facilities and moderately suited to building she development.

This soil is well suited to corn and soybeans, if the soil is used for cultivated crops, there is a very slight hazard of erosion on the more sloping areas. Adoquate drainage for the fluctuating water table may be beneficial. Conservation tillage, a practice that leaves crop residue on the surface throughout the year, helps to prevent soil loss caused by wind erosion. Returning crop residue helps to maintain good titth.

If used for pasture or hay, overgrazing or grazing when the soil is wat causes surface compaction and decreased infiltration. Propor stocking rates, pasture rotation, timely determent of grazing, and restricted use during wet periods help to keep the pasture and soil in good condition.

This Nicollet soll is in capability class I,

62D2—Storden loam, 9 to 14 percent slopes, moderately eroded. This strongly sloping, well drained soil is on convex side slopes of the uplands. Typically, the slopes are short. Individual areas are long and narrow and range from 10 to 20 acres.

Typically, the surface layer is light yellowish brown and dark grayish brown, calcareous loam. The substratum to a depth of about 60 inches is calcareous loam. The upper part is light yellowish brown, the middle part is pale brown, and the lower part is light brownish gray.

Included with this soil in mapping are a few small areas that contain more sand and gravel and are droughty. They make up 5 to 10 percent of the map unit.

Permeability of this Storden soil is moderate, and surface runoff is rapid. The available water capacity is

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roots; few worm channels; slightly acid; gradual smooth boundary.

- A13- 13 to 18 Inches; very dark gray (10YR 3/1) light silly clay loam, very dark grayish brown (10YR 3/2) kneaded, dark grayish brown (10YR 4/2) dry; moderate very line and fine subangular blocky structure; triable; few fibrous roots; few worm channels; slightly acid; gradual smooth boundary.
- A3—18 to 26 inches; very dark grayish brown (10YA 378) and dark brown (10YR 379) silty clay loam, very dark gray (10YR 371) coatings on peds, brown (10YR 573) dry; moderate fine subangular blocky structure; friable; few fibrous roots; few worm channels; slightly acid; gradual smooth boundary.
- B2t—26 to 37 inches; brown (10YR 4/3) silty clay loarn, dark brown (10YR 3/3) coatings on peds; weak medium prismatic structure perling to moderate medium subangular blocky; friable; thin discontinuous clay films; few fibrous roots; few worm channels; slightly acid; gradual smooth boundary.
- B3—37 to 49 inches; brown (10YR 4/3) ailty clay loam; weak medium prismatic structure parting to weak medium subangular blocky; friable; thin discentinuous silt coats; few fibrous roots; few worm channels; slightly acid; gradual smooth boundary.
- C—49 to 60 inches; yellowish brown (10YR 5/4) silty clay loam; few fine faint grayish brown (10YR 5/2) mottles; massive; friable; thin discontinuous silt coats; fow librous roots; slightly acid.

The solum ranges from 36 to 60 inches in thickness. The mollic epipedon ranges from 18 to 32 inches in thickness.

The A horizon is 25 to 32 percent clay. Reaction ranges from slightly acid to strongly acid. The B horizon is brown (10YR 4/3) or dark yellowish brown (10YR 4/4). The C horizon is sitt loam or sitty clay toam and is stratified in some pedons.

Zook series

The Zook series consists of poorly drained solls on flood plains commonly adjacent to foot slopes and bench escarpments. Permeability is slow. Zook soils formed in silty allovium that is less than 15 percent sand. Native vegetation was prairie grasses. Slope ranges from 0 to 2 percent.

Zook soils are similar to Colo soils and are commonly adjacent to Bremer and Nevin soils. Colo soils have less

clay in the solum. Bromer soils have thinner A horizons and less clay in the B horizon. They are on second bottoms or low stream benches. Nevin soils have thinner A horizons, are somewhat poorly drained, and are on high second bottoms and low stream bonches.

Typical pedon of Zook silty clay loam, 0 to 2 percent slopes, 1,040 feet south and 198 feet east of the northwest corner of sec. 20, T. 84 N., R. 18 W.

- Ap—0 to 9 inches; black (N 2/0) silty clay loam, black (N 2/0) dry; weak fine granular structure; friable; common fibrous roots; neutral; abrupt smooth boundary.
- A12—9 to 18 inches; black (N 2/0) heavy silty clay loam, black (N 2/0) dry; moderate very fino subangular blocky structure; friable; few fibrous roots; neutral; gradual smooth boundary.
- A13—18 to 25 inches; błąck (N 2/0) light slity clay, black (N 2/0) dry; moderate very fine and fine subangular blocky structure; firm; few fibrous roots; slightly acid; gradual smooth boundary.
- A31—25 to 32 inches; black (10YR 2/1) light sitty clay, dark gray (10YR 4/1) dry; weak medium prismatic structure parting to fine and medium subangular blocky; firm; few fibrous roots; slightly acid; gradual smooth boundary.
- A32—32 to 40 inches; black (10YR 2/1) heavy sifty clay loam, dark gray (10YR 4/1) dry; weak medium prismatic structure parting to fine and medium subangular blocky; fum; few fibrous roots; slightly acid; gradual smooth boundary.
- 82g—40 to 48 inches; very dark gray (10YR 3/1) silty clay loam; weak medium prismatic structure parting to weak fine subangular blocky; friable; few fibrous roots; slightly acid; gradual smooth boundary.
- B3g—48 to 60 inches; grayish brown (2.5Y 5/2) silty clay loam; few fine distinct strong brown (7.5YR 5/6) mottles; weak medium prismatic structure; friable; few fibrous roots; neutral,

The solum ranges from 45 to 64 inches in thickness. The entire solum is 5 to 15 percent sand and below a depth of 16 inches, it is 38 to 46 percent clay.

The A horizon ranges from 30 to 40 inches in thickness. It is black (10YA 2/1, N 2/0) silty clay loam or silty clay. The A horizon is 32 to 42 percent clay. Reaction ranges from neutral to medium acid. The 3 and C horizons are very dark gray (10YA 3/1), dark gray (10YA to 5Y 4/1), gray (5Y 5/1), or grayish brown (2.5Y 5/2).

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formation of the soils

This section discusses the factors of soil formation and relates these factors to the soils in Marshall County.

factors of soil formation

Soil is produced by the action of soil-forming processes on materials deposited or accumulated by goologic agencies. The characteristics of the soil at any given point are determined by the physical and mineralogical composition of the parent material; the climate under which the soil material has accumulated and existed since accumulation; the plant and animal life on and in the soil; the relief, or lay of the land; and the length of time the forces of soil development have acted on the soil materials (8).

Climate and vogotation are the active factors in the formation of soil. They act on the parent material and slowly change it into a natural body that has genetically related horizons. The effects of climate and vegetation are conditioned by relief. The parent material also affects the kind of profile that can be formed and, in extreme cases, determines it almost entirely. Finally, time is needed for the changing of the parent material into a soil. It may be much or little, but some time is always required for horizon differentiation. A long period generally is required for the development of distinct horizons.

The factors of soil formation are so closely interrelated in their effects on the soil that few generalizations can be made regarding the effect of any one unless conditions are specified for the other four. Many of the processes of soil development are unknown.

parent material and its goologic origin

Most of the soils in Marshall County developed from loess (windblown materials), glacial till (ice-laid materials), and alluvium (water-laid materials). A few areas of eolian sand are along the lowa River and Minerva and Honey Crooks. Parent materials in most places are built up tike tayers of a cake. These layers can be observed in road cuts and in places on side slopes. In this county, parent material was important in developing the general character of the soil profile.

The major Picistocene deposits of pre-Wisconsin age are either Kansan drift, Nebraskan drift, or both. The different drifts, or tills, are not readily differentiated in Marshall County. The glacial till ranges from none to over 300 feet in thickness.

Soils developed on the Kansan till plain during the Yarmouth and Sangamon interglacial ages. This soil development was before losss deposition. On nearly lavel interstream divides, the soils were strongly weathered and had a gray plastic subsoil called gumbotil. This gumbotil remains; it is soveral feet thick and very slowly permeable. The Clarinda soils developed in this gumbotil (15).

Geologic erosion has cut into and below the Yarmouth-Sangamon paleosol and into the Kansan till and older deposits. On the surface formed by this erosion, there is a stone line on top of till and erosional sediment called pedisediment. Soils that have a red clayey subsoil developed in the pedisediment, stone line, and subjacent till. This period of erosion and soil formation is called Late Sangamon. The Adair soils formed in the Late Sangamon paleosols (9).

The Kansan till is exposed mostly in hilly areas. The unweathered till is firm, calcaragus clay loam. It contains pebbles, boulders, and sand as well as silt and clay. The soils that formed in Kansan till during the Yarmouth and Sangamon ages were covered by locss. Geologic erosion has removed the locss and paleosols on many side slopes. In these places, the till is only slightly weathered at the surface and has been exposed only during the Wisconsin State of the Quaternary period (15). Shelby, Gara, and Lindley solls formed in slightly weathered glecial till.

Glacial till is exposed in many rolling areas in the northeastern part of Marshall County. The till in this part of the county was truncated during the early part of looss deposition in the Wisconsin age. The truncated till surface is called the lowan Erosion Surface (15).

The Iowan Erosion Surface is multi-leveled. Several levels of summits occur in a gradual progression from the stream valleys loward the low crests that mark the drainage divides. Other features typical of the Iowan Erosion Surface are erratics and paha. Erratics are large boulders partially buried or lying on the surface. Paha are prominent elongated ridges and are oriented in a distinct northwest-southeast direction. The core of the paha is an erosional romnant of the Kansan till, but the Yarmouth-Sangamon paleosol is intect (16). The paha are capped with thick loess or sand and loess.

The Iowan Erosion Surface is about 15 to 60 feet fower than the adjacent Kansan surface. The loess cap on the summits thins on shoulders and side slopes. Dinsdale soils formed in thin loess and glacial till.

DOCUMENT PA ARCHIVE The glacial till is less than 100 feet thick in most of the lowan Erosion Surface areas. Geologic erosion has reworked the glacial till on hillslopes. Liscomb soils formed in loamy surface sediment and glacial till.

Loess of Wisconsin age covers most of Marshall County and is an extensive parent material. It consists mainly of silt and clay particles that have been deposited by wind. Variations in the loess are related to the distance from the source of loess. The source of loess in Marshall County is probably the bottom lands to the northwest and the lowa River. The major deposits of loess in Marshall County are older than 14,000 years (75).

On the stable upland divides of the Kansan till plain, the loess is about 21 feet thick. Killduff, Tama, Muscatine, Garwin and Sperry soils are formed in loess on this landform. On the lowan Surface, the loess is about 12 feet thick. Tama, Muscatine, Garwin, Sperry, and Harpster soils formed in loess on this landscape. Dinsdale soils formed in both loess and glacial till.

Along the rivers, loess deposits are twice as thick on both the Kansan plain and lowan Surface. Downs, Fayette, Tama, and Killduff soils formed in this loess. Some of the high stream benches along the major streams and rivers are covered with loess deposits as thin as 7 feet. Tama, Muscatine, and Downs soils formed in this loess.

A glacial till lies above the loess in the western part of Marshall County. This till is part of the Bemis moraine system of the Des Moines Lobe. The till is of Cary age, a subdivision of the Wisconsin Glacial Stage. The evidence for the geologic youth of the Cary Glaciation is the lack of deep weathering, the unleached calcareous till at a shallow depth, the poorly developed surface drainage, and many closed depressions (15).

Two major erosional and depositional episodes in recent time have modified the Cary till surface. The initial relief has been reduced by the movement of material from hill summits to depressions and lowland areas. The sediment on hillslopes has selectively sorted from the summits to the toe slopes and into the depressions (15). Clarion, Nicollet, Webster, Canisteo, Harps, Lester, and Storden soils formed in the Cary glacial drift.

Alluvium consists of sediment that has been removed and laid down by water. As it moves, this sediment is sorted to some extent, but only in a few places is it as well sorted as the loess. Also, alluvium does not have the wide range of particle sizes that occurs in glacial drift. Because the alluvium in Marshall County is derived from loess and glacial drift, it is largely a mixture of silt and clay, silt and sand; or sand and gravel.

Alluvial sediment is the parent material for the soils on flood plains on low benches, and in long drainageways. As the river overflows its channels and the water spreads over the flood plains, coarse textured material, such as sand and coarse silt, are deposited first. As the floodwater continues to spread, it moves more slowly, and finer textured sediment is deposited. After the flood

has passed, the finest particles, or clay, settle from the water that is left standing in the lowest part of the flood plain. The Hanlon, Spillville, Nodaway, and Lawson soils commonly are closest to the stream channel and are coarser textured than the other soils on flood plains. The Ackmore, Coland, and Colo soils are on upland drainageways as well as on the flood plains of larger, streams. Colo soils are extensive. Zook soils commonly are on the lower part of the bottom land and are one of the finest textured soils derived from alluvium in the county.

Alluvial stream benches are intermediate in elevation between the flood plains and the loess-covered benches. The Wiota, Nevin, Koszta, and Bremer soils formed in the silty alluvium on this landform. The Saude, Waukee, Lawler, and Hanska soils formed in loamy-oversandy alluvium on these benches.

Sediment that has accumulated at the foot of the slope on which it originated is called colluvium or local alluvium. The Ely, Judson, Terril, and Vesser soils formed in the sediment on the foot slopes. Downslope from these soils is alluvial sediment carried in to the area from distant sources.

A secondary topographic form associated with alluvial plains is sand dunes. Fine sand is blown by the wind from stream channel and flood plain surfaces to higher elevations (12). Accumulations of dune sand are found on low stream benches, on high loess-covered benches, and upland fringing the leeward side of valleys. Dickinson, Sparta, and Chelsea soils are formed in eolian sand that is more than 5 feet thick.

climate

The soils in Marshall County have been developing under a midcontinental, subhumid climate for the past 5,000 years. The morphology and properties of most of the soils indicate that this climate was similar to the present climate. From 6,500 to 16,000 years ago, however, the climate probably was cool and moist and conducive mostly to the growth of forest vegetation.

The influence of the general climate in a region is modified by local conditions in or near the developing soils. For example, soils on south-facing slopes formed under a microclimate that is warmer and drier than the average climate of nearby areas. The low-lying, poorly drained soils on bottom lands formed under a wetter and colder climate than that in most areas around them. These local differences influence the characteristics of the soil and account for some of the differences among soils in the same climatic region.

vegetation and animal life

Many changes in climate and vegetation have taken place in lowa during the past 28,000 years (14). The period between 28,000 to 11,000 years ago was dominated by coniferous forest with a transitional period of birch and alder. Deciduous forest dominated 11,000 to

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9,000 years ago. A very dry period occurred between 9,000 to 3,200 years ago, with prairie vogetation dominating. Trees, especially oak, have invaded the prairie since 3,200 years ago, but the prairie still dominates.

For the past 5,000 years, the soils of Marshall County appear to have been influenced by two main kinds of vogetation—prairie grasses and trees. Big bluestern and little bluestern were the main prairie grasses. The main trees were deciduous, mainly cak, hickory, ash, olm, and mapte.

The effects of vegetation on soils similar to those in Marshall County have been studied recently. Evidence shows that vegetation shifted while soils developed in areas bordering both trees and grasses. The morphology of the Downs, Sparta, Gara, and Lester soils reflect the Influence of both trees and grasses. The Chelsea, Fayette, and Lindloy soils formed under the influence of trees (11). Grasses influenced the development of the Tama, Muscatine, Garwin, Clarion, Colo, Dickinson, Killduff, Shelby, and Zook soils and the remaining minor soils in the county.

In most places, the soils that formed under trees are lighter colored, are more acid, and have a thinner surface layer that is lower in organic matter content than soils that formed under grasses. The soils in the county that formed under shifting vegetation or mixed grasses and trees have properties that are intermediate between the properties of soils formed under grasses and those of soils formed under trees.

Animals, such as earthworms and burrowing animals, help to keep the soil open and porous. Bacteria and fungl decompose the vegetation, thus releasing nutrients for plant food.

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Relief also may cause important differences among soils. It indirectly influences soil development through its effect on drainage. In Marshall County, the soils range from level to very steep. In many areas of the bottom lands, the nearly level soils are frequently flooded and have a permanently or periodically high water table. In depressions, water soeks into the nearly level soils that are subject to flooding. Much of the reinfall runs off the steep soils or uplands.

Level soils are on the broad upland flats and on the stream bottoms. The very ateepest soils in the county are generally on slopes near the major streams and their tributaries. The intricate pattern of upland drainageways indicates that in most of the county the landscape has been modified by geological processes.

Generally, the soils in Marshall County that formed where the seasonal water table was well below the subsoil have a subsoil that is yellowish brown. Examples of such soils are the Clarion, Dickinson, Downs, Killduff, Shelby, and Tama soils. The Lawler, Muscatine, Nevin, and similar soils formed where the seasonal water table

fluctuated and was periodically high. The Garwin, Webster, and similar soits formed where the seasonal water table is high and have a subsoil that is dominantly grayish. The Cole, Garwin, Webster, Zook and similar soils developed under prairie grasses and have a high water table. These poorly drained soils contain more organic matter in the surface layer than do well drained soils formed under prairie grasses. Clay accumulates in the subsoil of such soils as Sperry soils that are slightly depressional or nearly level. This is because a large amount of water enters the soils and carries clay particles downward. Sperry soils are called claypan soils because they have a hard layer where the greatest amount of clay accumulates.

The Killduff, Shelby, Tama, and similar soils that have wide slope ranges have some properties that change as slope increases. Two of these properties are the depth to carbonates and the thickness of the surface layer. Depth to carbonates is shallow where slopes are steepest. The surface layer becomes thin in stronger sloping soils.

time

Time is required for a soil to develop. An older and more strongly developed soil shows well defined genetic horizons. A soil with less development shows no horizons, or only weakly defined ones. Most soils on the flood plains are of this kind because these materials have not been in place long enough for distinct horizons to develop.

As an example, the effects of time can be seen by the increase of clay in the subsoil. A high clay content in the subsoil compared to that in the surface soil indicates a high degree of soil profile development has taken place. This can be important because soils with a high clay content in the subsoil generally have poorer drainage.

Material is generally removed from soils on steep slopes before there has been time for a thick profile with strong horizons to develop. Also, much of the water runs off the slopes rather than through the soil material, so that even though the material has been in place for a long time, the soil may exhibit little development.

Most of the parent materials in Marshall County are thousands of years old. The present land surface and many soils are much younger because of recent geologic erosion (15).

The oldest soils in Marshall County are those formed in loss on upland summits and on nearly level, toess-covered stream benches. The Garwin, Harpster, Muscatine, Sperry, and Tama soils might be as old as 14,000 years (13). The Clarion and other soils that formed in Cary glacial drift are as young as 3,000 years. The Liscomb and other strongly sloping soils on the lowar Eroston Surface area are as young as or younger than 2,000 years. The Shelby and other strongly sloping or steeper soils on the Kansan till plain are as young as or younger than 6,800 years. Soils formed in alluvium

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and eclian sand are only a few thousand years old or less. The Wiota, Saude, and other soils that formed in materials on stream benches are the oldest alluvial soils. The Colo, Hanton, Spillville, and other soils that formed in materials on the flood plains are younger than Wiota and Saude soils. The Dickinson, Sparta, and Chelsea soils are of an age intermediate between Hanton and Wiota soils. Two soils that formed in alluvium, Nodaway and Ackmore soils, are less than 125 years old.

man's influence on the soil

Important changes take place if the soil is cultivated. Some of these changes have little effect on productivity; others have a drestic effect. Changes caused by erosion generally are most apparent. On many of the cultivated soils in the county, particularly the gently rolling to hilly soils, part or all of the original surface tayer has been lost through sheet erosion. In some places, shallow to deep guilles have formed.

A study of eroded soils in lowe, including Marshall County, was started in 1974 by the Iowa Cooperative Soil Survey. Soil descriptions and laboratory data of selected sites are available. Initial results show a lower organic matter content in eroded soils.

Nodaway and Ackmore soils formed in stratified slit learn alluvium on alluvial fans and flood plains. This alluvium has been deposited on the bottom during the past 125 years of cultivation. Many sloping soils have lest topsoil through water erosion to form these recent flood plain deposits. About 23 percent of the soils in Marshall County are eroded.

In many continuously cultivated fields, the granular structure that was apparent when the grassland was undisturbed is no longer present. In these fields the surface tends to bake and harden when it dries. Fine textured soits that have been plowed when too well tend to puddle and are less permeable than similar soils in undisturbed areas. Poor seedling emergence and root penetration result in these areas.

Man has done much to increase the productivity of the soils and to reclaim areas not suitable for crops. He has made large areas of bottom land suitable for cultivation by digging drainage ditches and constructing diversions and dikes. Broad flats and nearly level soils, such as Garwin and Webster soils, have been greatly improved for cultivation by installing some kind of drainage system. By adding commercial fertilizers, man has counteracted deficiencies in plant nutrients and has made some soils more productive than they were in their natural state.

processes of horizon differentiation

Horizon differentiation is caused by four basic kinds of change—additions, removals, transfers, and transformation in the soil system (18). Each of these four kinds of change affects many substances that compose soils, such as organic matter, soluble salts, carhonates.

sesquipxides, or silicate clay materials. In general, these processes tend to promote horizon differentiation, but some tend to offset or retard it. These processes and the changes brought about proceed simultaneously in soils, and the ultimate nature of the profile is governed by the balance of those changes within the profile.

An accumulation of organic matter is an early step in the process of horizon differentiation in most soils. Soils in Marshall County range from very high to very low in the amount of organic matter that has accumulated in their surface layers. Some soils that were formerly quite high in organic matter content are now low because of erosion. The accumulation of organic matter has been an important process in the differentiation of soil horizons in Marshall County.

The process through which substances are removed from parts of the soil profile is important in the differentiation of soil horizons. The movement of calcium carbonates and bases downward in soils is an example. All the soils in the county, except Canistee, Harps, Harpster, and Storden soils, have been leached free of calcium carbonates in the upper part of their profile. Some soils have been so strongly leached that they are strongly acid or very strongly acid even in their subsoil.

Phosphorus is removed from the subsoil by plant roots and transferred to other parts of the plant, it is then returned to the surface layer in the plant rosidue. Those processes effect the forms and distribution of phosphorus in the profile.

The translocation of silicate clay minerals is another important process. The clay minerals are carried downward in suspension in percelating water from the surface layer. They accumulate in the subsoit in poros and root channels and as clay films. In Marshell County, this process has had an influence on the profiles of many of the soils. In other soils, the clay content of the horizons are not markedly different and other evidence of clay movement is minimal.

Another kind of transfer that is minimal in most soils, but occurs to some extent in very clayey soils, is that brought about by shrinking and swelling. This causes cracks to form and incorporates some material from the surface layer into lower parts of the profile. Clarinda soils are examples of soils with potential for this kind of physical transfer.

Transformations are physical and chemical. For example, soil particles are weathered to smaller sizes. The reduction of iron is another example of a transformation. This process is called gleying and involves the saturation of the soil with water for long periods in the presence of organic matter, it is characterized by the prosence of ferrous iron and gray colors. Gleying is associated with poorly drained soils, such as the Garwin soils. Reductive extractable iron, or free iron, is normally lower in somewhat poorly drained soils, such as Muscatine soils (20). Still another kind of transformation is the weathering of the primary epatite mineral present in soil parent materials to secondary phosphorous compounds.

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geologic profile of Marshall County

Marshall County has a gontly undulating to rotting and steep fandscape. It is mainly dissocted by the Ibwa River and the North Skunk River. Clear Creek, the three Timber Creeks, Linn Creek and three Minerva Croeks, and the two Asher Creeks are the principal interior streams (4).

The broad upland areas are dominated by loess at the surface. The soils formed in loess, such as the Muscatine and Tama soils, are the most productive soils in Marshall County and in Iowa. Strongly sloping to steep soils, such as the Shelby soils, formed in glacial till and till-derived materials. These soils are on slopes that descend to the major streams. Along the bottom of the streams are complex patterns of alluvium and related areas of wind-reworked sands. In the western part of the county are Clarion soils formed in Wisconsin glacial till,

Although the unconsolidated materials dominate the present land surface, such bedrock as timestone and sandstone is exposed locally. All the bedrock material would be exposed if the unconsolidated materials were removed. However, the surface exposed would not be flat but would exhibit landforms much like the present surface. There are bedrock valleys and ridges which can affect water movement within the overlying unconsolidated materials.

Bodrock is exposed in about 21 different sections in Marshall County. In most places the natural outcrops are small. The bedrock exposed in Marshall County is primarily of Mississippian and Pennsylvanian age (7). The general rock types are mostly delomite and sandstone. The delomite is quarried and provides stone for aggregate, road surfacing, and agstone. Some coal measure shales are exposed by Honey Crock.

Information collected during the dritting of wolls and test hotes is available for over 180 wells in Marshall County (6). Detailed information is available for many of those wells. Same of these wolls are dritted into rocks that are aquifers. Three distinct levels of rocks that are aquifers occur in Marshall County (5).

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TABLE 15. -- ENDINEERING INDEX PROPERTIES -- Contigued

	Depth	USDA texture	Classification		Frug-	 	Orcontage passing			<u> </u>	
Soil name and map symbol			Unified	AASHTO	lmenta > 3	}	hteve.	number-		Liquid limit	
	+ - <u>y -</u> ;	·	-{		1nenea Pet	- 4	10	 40 _	200	Pet	Index
Voaser	117-26	Silt lonm Silt lonm Silt lonm	-1 CL	A6 A-6 A-7	0 0	1 100 1 100 1 100	100 100 100	198-100	 95-100 195-100 195-100	30-40 30-40	1 10-20 1 10-20 1 10-20 1 20-30
Zook	118-60 	Stity clay tomm Silty clay, allty clay loam.	ICH	Λ-T Α-7	0	100	100		95-100		20-35 35-55
Nidollet	120-33 133-60	Loam Clay loam, loam Loam	CL, ML	1A-6. A-7 1A-6. A-7 1A-6. A-4	0-5	95-100 95-100 95-100	195-100		56-65 55-80 50-75	35-50 35-50 30-40	10-25 15-25 5-15
6202 Storden	0-8 8-60	Loum+	ML, CL CL-ML, CL	Λ-4. A-6 Λ-4, A-6	0-5 0-5	95-100 9 5-100	95-100 85-97	70-85 70-85	55-70 55-70	30-40 20-40	5-15 5-15
	8-60 	Fine dand, sond. losmy mand. 	SP-SM	A-3, A-2-4		100	100	65-80 65-80			NP NP
	1 7-50. 150-601	Chiy toam, loam (Coam, clay loam	l ar	A-4, A-6 R-6, A-7 A-6	l o	195-100	90-100	185-95 185-95 185-95	156-76-1	15=30 30=45 30=40	, 5-15 15-25 15-25
Novin	24-47 47-60	Silty clay land	ICL	in=6. A-γ in=7 in=γ	0	100 100 100 100		100 95-100 95-100		35-45 40-50 40-50	10=20 20-30 20-30
	1 7-451	Loam	icu	 A=6, A=7 A=6, A=7	0-5 (95-100 90-95 90-95	85-95		 65-70 55-70 65-70	30-40 30-45 30-45	15-25
Ada1r	6-601	Ciny loam	CL CH	λ-6 Λ-7		95-100 95-100		75-90 70-90 		30-40 40-55	10-20 20-30
95 Racys	18-43 -	Loam, clay loam Loam, clay loam, andy clay loam. Loam	CC, CH	A-6, A-7 A-6, A-7 A-6	0-5	95-100	95-100	 80-90 80-90 	65-80	30-95 30-60	
107Wabater	U-20	Silty clay loam Clay loam, silty	ст. си	A-7, A-6 A-6, A-7	0-5 1	100	95-100	10-60 185-95 185-95	70-90	25-40 35-60 35-50	10-25 15-30 15-30
	39-60	clay loam, loam. Loam, sundy loam, clay loam.	cı.	A-6	045	95-100	90-100	75-85 75-85	50-75	30-40	70-50
116 Durwin	0-17 i	Silty clay Loam	CL, CK CH, CL	A=7 A=7		100	100			45-55 45-55	
119 Museutins	0-131	Silty clay loam	Gr. Gr	A-7	0	100	100 100		95-100 95-100	40-50 40-50	15-25 20-30
120, 120B, 120C, 120C2, 120D2, 120E2	16-47 47-60	Silty clay loam	CL	A-6, A-7 A-7 A-6, A-7	0 0	100	100 100 100	100	95-100 95-100 95-100	35-50 40-50 35-45	10-20 15-25 15-25
Sporry	27-37[willy clay.	CH :	A-0 A-7	00	100	100	100	95-100 95-100	30-40 50-65	10-20 25-35
133	0-11	nilt loun. Silty clay loam	CL, CH	Λ-7 [Λ-7 [Λ-7]	0	100		100 		40-50 	20-30 15-30 20-30

See footnote at and of table,

TABLE 16. -- PHYSICAL AND UNEMICAL PROPERTIES OF SOIGS--Concinued

Soll name and map mymbol	Dopth	 	 Moist hulk _density	 Permonbility 		Soil remotion		Erneien Cactors K T		erodi-	 Organic matter
	<u>ln</u>	Pet	<u>075m3</u>	<u> In/hr</u>	<u>In/in</u>	[10]		<u> </u>	<u> -</u> -	} 	<u>Pet</u>
	18-60 	3 6 -45 	1.30-1.45	0.06-0.2	0.2140.23		High			7	5-7
	20-33 33-60 	2435 22-28 	1.25-1.35 1.35-1.45.	0.6-2.0 0.6-2.0	0.17-0.22 0.15-0.19 0.14-0.19	9.6-7.8	Modorata Modorato Joh	10.321		6	5-6
62D2 Storden	0-8 8-60	18-27 18-27	1.35-1-45 1-35-1-65		0.20-0.22 0.17-0.19	7-4-8.4 7-4-8.4	Low Low	0.78 0.37	5	4t,	-5-2
630, 63 <u>E</u> ChelsoA	0-8 8-60	8-15 5-10	1.50-1.55 1.55-1.70				Low		5	2	4.5
65P, 69a Lindley	7-501	25-35	1.20-1.40 1.50-1.75 1.75-1.85	0.2-0.6	0.16-0.18 0.14-0.18 0.13-0.16	4.5-6.5	Low Moderate Moderate	0.321	5 . I	6	.5−1
	[24-47]	30-351	1.30-1.35 1.30-1.40 1.40-1.45	0.6-2.0	0.21-0.23 0.18-0.20 0.18-0.20	6.1-6.5	Moderate Noderate Noderate	0.431	- i	7	4-G
9302¶, 9362P: Sholby	7-491	30-35	1-50-1-55 1-55-1-75 1-75-1-85	0.2-0.6	0.20-0.22 0.16-0.18 0.16-0.18	9-6-7-8 j	Moderate Moderata Moderata	0.281	5	6	. 5-2
Adair	0-6 6-60	27-35 38 - 50	1.45-1.50 1.50-1.60		0.17-0.19 0.13-0.16		Modoratel Kign		2	6	1-3
95 	18-431	18-32	1.35-1.40 1.40-1.50 1.50-1.70	0.6-2.0	0.19-0.21 0.17-0.19 0.17-0.19	7.9-8.4 [Moderate Moderate	0.32	5	41.	4-6
107 Woboter	20-39 L	25-351	1.35-1.40 1.40-1.50 1.50-1.70	0.6-2.0 [0.19-0.21 0.16-0.18 0.17-0.19	6.6-7.8 1	Moderate Moderate Moderate	0.32	5	6	6-7
118i Úzretn	0-17 17-60	30-35 28-35	1.30-1.35	0.6-2.0 0.6-2.0	0.21-0.23 0.18-0.20	5.6-7.3 6.1-7.3	High	p.58] 0.58]	5	7	67
Nuacatino	0-19 19-60	28-30 30-34	1.30-1.35 1.28-1.35		0.22-0.24 0.18-0.20		Moderate		2	6	5-6
120, 1208, 1200, 12002, 12002, 12082	0-161	 24-29	1 - 25 - 1 - 30	0.6-2.0	0 22-0 241	6 3-7 3 11	 			}	
Tama	16-47 : 47-60 :	28-34 22-28	1.30-1.35)	0.6-2.0	0.18-0.2019 0.18-0.2019	1.6.0	Moderate Moderate	0.431	,	7	1=5
122) Sporry }	22-3711	38-451	1.35-1.40 1.90-1.45 1.95-1.50	D.06-0.7 1	v.14-0.16 <u>:</u>	5.1-6.5	Moderato High Kigh	0-431	5	6	3-4
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39Coland			1.40-1.50				1gh 1 1gh 0		9	7	5-7

San footnote at end of table.

Attachment B

Main Ash Pond Stability Analyses Results

Ten Most Critical Surfaces

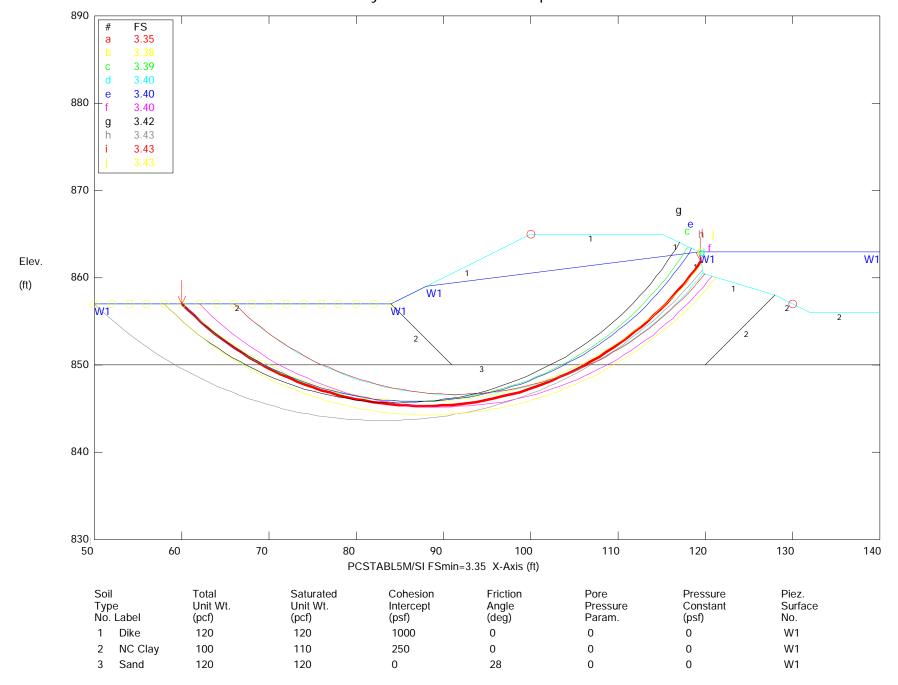
Sutherland Generating Station

Source:

Program psSTABL5m/SI output by Aether dbs, July 2012

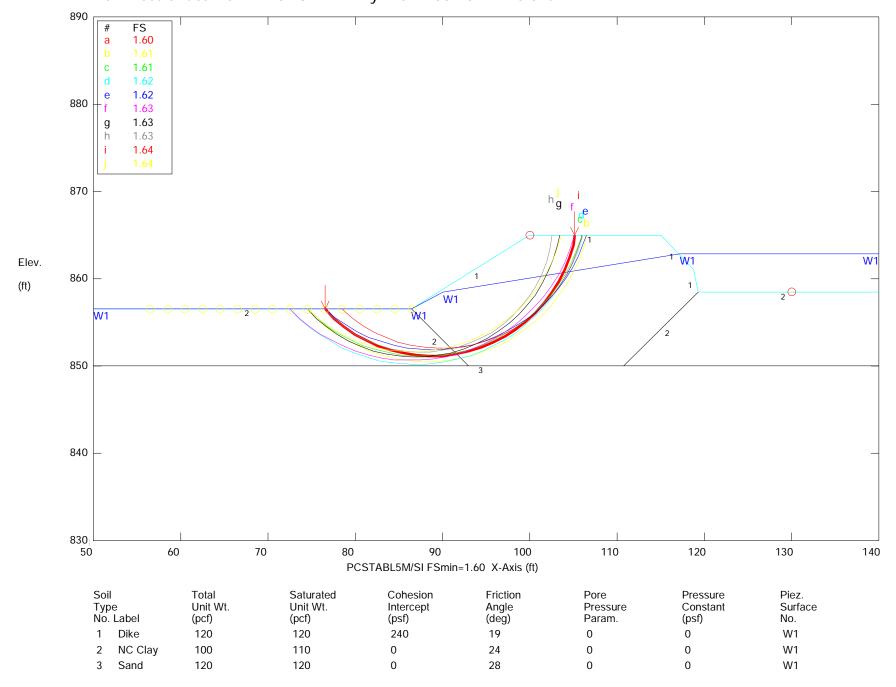
CONFIDENTIAL BUSINESS INFORMATION

Alliant Energy - Marshalltown, Iowa Static Case - Total Stress Analysis Ten Most Critical. C:MARSH42.PLT By: TCW 06-26-12 1:59pm



CONFIDENTIAL BUSINESS INFORMATION

Alliant Energy - Marshalltown, Iowa Static Case - Effective Stress Ten Most Critical. C:MARSH31.PLT By: TCW 06-25-12 10:07am



Attachment C

Curriculum Vita

Mr. Timothy J. Harrington, P.E.

Mr. Thomas C. Wells, P.E.

Aether DBS



TIMOTHY HARRINGTON, P.E.

Principal

PROFESSIONAL ENGINEERING LICENSES

New Jersey, 1985 (GE 30238); Delaware, 1987 (7145); New York, 1986 (62728-1); Pennsylvania, 1979 (28505-E); Michigan, 1980 (27309); Indiana, 1981 (19646); Illinois, 1984 (062-041983); California, 1983 (35743); Georgia, 1984 (14874); Florida, 1982 (31484); Wisconsin 2003 (36243)

QUALIFICATIONS

Mr. Harrington has 37 years in the application of engineering solutions to the management and completion of projects involving many geotechnical, and environmental remediation components, specializing in soil and sediment remediation. He has:

- Managed Large Remediation Projects from design through construction
- Managed complex Superfund projects with intertwined design, regulatory and construction issues
- Negotiated for single and multiple PRP groups to receive agency approval of remedial actions
- Negotiate for single and multiple PRP groups to drive completion of construction remediation
- Developed innovative solutions that satisfy agency objectives and reach owner goals for the project
- Recognized as an expert on contaminate sediment and soil remediation in several USEPA regions
- Consulted on the recovery of fly ash from the Emory River in Kingston, Tennessee

Geotechnical Engineering Experience:

Mr. Harrington has consulted on the design and construction of systems to control slope stability and liquefaction of loose soils.

- Consultant on the means and methods of recovering 2.5 million cubic yards of fly ash from the Emory River near Kingston Tennessee.
- Personal observation of the fly ash impoundment failure at Kingston shortly after the failure and before the start of remedial action.
- Stability analysis and design for facilities in dune sand around Lake Michigan to maintain excavations.
- Stability analysis of Uranium Tailings ponds constructed by hydraulic placemnt methods in New Mexico.
- Design of systems to stabilize Uranium Tailings ponds by controlling seepage on the embankment face.
- Design of methods to remediate loose soil to control liquefaction by compaction and/or drainage methods.

• Liquefaction testing of soils by both laboratory and field methods.

EXPERIENCE

Principal and Senior Environmental Engineer, aether DBS., Naperville, IL

Mr. Harrington's firm was acquired in January of 2006 by Hard Hat Services (now aether DBS). Both firms coming together increased respectively each others' capabilities as well as offered additional services to their clients. Mr. Harrington manages major environmental remediation efforts and solutions as well as being responsible for the Chesterton, Indiana office. His expertise is in soils, sediment and marine environments.

President, Harrington Engineering & Construction, Inc., Chesterton, IN

Mr. Harrington was owner and provider of engineering and construction management services on domestic and international projects. Projects include design and construction management for the rebuilding of intake structures in Lake Michigan, removal and processing of sediment containing lead shot to restore beneficial reuse of a critical ocean shore environment, design of an upland landfill to contain sediment from the Fox River in Green Bay, Wisconsin, design of an in-water landfill in Auckland, New Zealand to contain low solids content sediment, and services on numerous facilities to construct or repair dock walls and marinas, resolve drainage problems and repair unstable slopes.

Canonie Environmental Services Corporation, Chesterton, IN

As vice president of the construction services division, Mr. Harrington was responsible for the direction of operations in the eastern USA. Projects included the construction of an upland disposal facility at the 102nd street site in Tonowanda, New York and the excavation of sediment from the St. Lawrence River, soil thermal treatment on high plasticity clay in Memphis, Tennessee, and site restoration including the removal of lime sludge and riverbank restoration in western Pennsylvania.

Rust Remedial Services Inc., Chicago, IL

Mr. Harrington served as Vice President and General Manager responsible for the operations of the Northern Region and the Thermal Operations groups. He managed work under contract totaling approximately \$400,000,000 and including numerous jobs where sediment remediation was a part of the total remedy including the Brio site in Houston, Texas, the construction of landfills in New York and Massachusetts, and removal of solidified sludge from two 20-acre basins in Southern New Jersey.

Canonie Environmental Services Corporation, Chesterton, IN

Mr. Harrington served as vice president of eastern operations responsible for design and construction projects, project manager, and project engineer for design and construction field engineering. Work included the design and construction of in-water and upland landfill's at Waukegan Harbor, Illinois, design and construction of a cap and slope protection for remnant sediments in the Hudson River, work on landfills caps in New Jersey and Indiana, and numerous projects working as a geotechnical engineering consultant on failure investigations.

Resume 2



Tim Harrington

D'Appolonia Consulting Engineers, Inc., Pittsburgh, PA

Mr. Harrington worked as a project engineer on projects to build power plants, on the investigation and design of mine tailing impoundments for uranium tailings in New Mexico, on design of underground mine works for the waste isolation pilot plant in New Mexico, and on several projects for water supply and dewatering of aquifer formations.

EDUCATION

Michigan State University – Masters of Science in Civil Engineering (Geotechnical and Structural Engineering Specialty)

Michigan State University – Bachelor of Science in Civil Engineering

CERTIFICATIONS

- 40-Hour OSHA HAZWOPER Training
- 8-Hour Refresher for 40-Hour Hazardous Training
- Certificates for Continuing Education from ACI, AISI, SJI and others for Renewal of Professional Licensing

PROFESSIONAL ACTIVITIES

American Society of Civil Engineers American Concrete Institute



Resume 3







THOMAS CHARLES WELLS, P.E.

Senior Project Engineer

PROFESSIONAL ENGINEERING LICENSE

Michigan, 1991 (6201036924)

QUALIFICATIONS

Mr. Wells has over 35 years of geoenvironmental engineering and database management / programming experience. As a senior engineer for Aether DBS, Mr. Wells has supplied both office and field based engineering and information technology support services.

As a Professional Engineer, Mr. Wells has considerable experience in the key areas of geotechnical, environmental, hydrology, hydraulic, and foundation engineering. He has continued to practice in these areas as a part of his engineering/database focus.

Geotechnical Engineering Experience:

Mr. Wells has contributed to many heavy construction projects involving industrial facilities and environmental remediation. Geotechnical engineering related projects / tasks have included:

- Performed stability analyses for 8 miles of I-74 in Dearborn County, Indiana following a major interstate highway embankment failure. The stability investigation led to the design of a corrective berm on a similar nearby side-hill highway embankment.
- Performed stability analyses for a riparian fill design following the foundation soil failure of approximately 800 feet of ore yard at Sparrows Point, Maryland.
- Analyzed the extreme settlement (3-4 feet) of Chemical Storage Tanks in Paulsboro, New Jersey.
- Investigated and analyzed a slope stability failure along the St. Joseph River in Michigan.
- Analyzed a slope stability failure along the Grand Calumet River in Gary, Indiana and designed a corrective slope.
- Development and improvement of a 1-D finite-difference numerical model to simulate large-strain soil/sediment consolidation for use in predicting the large settlements that occur in hydraulically placed sediment.

EXPERIENCE

WELLS Technical Services, Chesterton / Union Mills, IN

As a sole Proprietor serving primarily Aether DBS (formerly Harrington Engineering & Construction), Envirocon, Inc. and Locus Technologies, Mr. Wells supplies engineering and information technology support services on a project-by-project basis. Aether DBS specializes in Sediment Restoration Services, Marine Design, Environmental Engineering, and Site Remediation. Envirocon is a full-service environmental remediation, demolition and civil construction contractor. Locus Technologies is an engineering and construction management firm based in northern California and serving primarily the environmental market. Locus Technologies is the leader in on-demand world-wide-web based Environmental Data Management Software, Services and Solutions.

Harding Lawson Associates, Chicago, IL

As an associate engineer in the Chicago office, Mr. Wells contributed to multiple projects and systems including HLADBMS (the Harding Lawson Associates DataBase Management System). HLADBMS was used to manage site characterization data generated by environmental projects. Mr. Wells also served as the North Carolina Low Level Radioactive Waste Facility feasibility project database administrator in Raleigh, NC during the project start-up phase November 1996 through March 1997.

Canonie Environmental Services Corporation

Mr. Wells served as a Technical Manager / Staff Consultant where he provided engineering and information technology support to both the technical and administrative staffs. Mr. Wells also acted as the drafting supervisor and network administrator at times (while performing his other roles). Geotechnical and Environmental project work included ground water & hydraulic modeling, geotechnical analysis & foundation design and geoenvironmental data management.

Environmental construction management tasks included the development of a construction equipment cost management system and the development of a companywide environmental construction cost estimating system used to estimate project costs totaling millions of dollars.

D'Appolonia Consulting Engineers, Inc., Pittsburgh, PA

Mr. Wells acted as the Computer department's liaison with the technical staff, supported project usage of the PRIME® super-minicomputers, and Mr. Wells also assisted with ground water modeling projects. During his first project assignment beyond graduate school, Mr. Wells authored a flood-routing program for a probable maximum flood study. During this period as a staff engineer, Mr. Wells performed pile driving, slope stability, and foundation analyses. He designed foundations, waste embankments, earthen dams, drainage channels, and spillways.

EDUCATION

Penn State University – Certificate in Geographic Information Systems

Michigan State University – Masters of Science in Civil Engineering (Geotechnical and Hydraulics

/ Hydrology Engineering Specialty)

Michigan State University – Bachelor of Science in Civil Engineering

CERTIFICATIONS

Resume

- 40-Hour OSHA HAZWOPER Training
- 8-Hour Refresher for 40-Hour Hazardous Training
- Certificates for Continuing Education from ASTM, Purdue University and others

PROFESSIONAL ACTIVITIES

American Society of Civil Engineers

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